

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
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U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KEITH RICKS,

aka "K-Mack,"

MACEO MOORE,

aka "Chase,"

aka "Paper,"

MAURICE GOLSTON,

aka "Reese,"

LEAMON SHEPHARD,

aka "Juice,"

MARCUS BLUE,

aka "Blue,"

DIONTE THOMPSON,

aka "Dionte Ricks,"

aka "Pringles,"

CARL D. AKINS,

DARNELL ALEXANDER, JR.,

BRANDY M. BATES,

aka "Weezy,"

BENEDITTO A. BELFIORE,

aka "Ditto,"

ROBERT BELK,

STEVENSON BLACK,

aka "Black,"

DOMINIQUE A. BLAIR,

LATRICE N. BLEVINS,

MICHAEL BUCHANAN,

aka "Israel,"

PIERRE A. CAMPBELL,

) SUPERSEDING INDICTMENT

) JUDGE CHRISTOPHER A. BOYKO

) CASE NO. 1:13CR345

) Title 21, §§ 841(a)(1),

) (b)(1)(A), (b)(1)(B), and

) (b)(1)(C), United States Code

) Title 21, § 846, United

) States Code

) Title 21, § 843(b), United

) States Code

) Title 21, § 856(a)(2), United

) States Code

) Title 18, § 1956(a)(1)(B)(i),

) United States Code

) Title 18, § 2, United States

) Code

) Title 18, § 922 (g)(1),

) United States Code

) Title 18, § 1952(a)(3),

) United States Code

FREDERICK L. DARLING,)
 aka "Freddy Fox,")
JACOB O. DERRICKSON,)
LEAMON EDDIE,)
 aka "Budda,")
DANA M. ERVIN,)
COREY D. ETHERIDGE,)
ANTWON EVANS,)
 aka "Twon,")
FREDERICK FERRELL,)
 aka "Little Fred,")
TERRANCE L. FLETCHER,)
 aka "Black T,")
ROBERT L. FOWLKES, JR.,)
JOVAN FUSSELL,)
JERMAINE D. GRAYSON,)
LACHELLE T. HALL,)
GREGORY HAMILTON,)
 aka "Duke,")
KENNETH E. HARRIS,)
RYLAND L. HARRIS, JR.,)
 aka "Slim,")
DAVID D. HARSLEY,)
ERIAN J. HARWELL,)
CARLTON A. HIGDON,)
DOMINIQUE E. IVORY,)
DOUGLAS T. JOHNSON,)
LUTHER B. JOHNSON,)
MICHAEL L. JONES,)
 aka "Monk,")
ANDREW E. LOVING,)
DEVONTA P. MAXWELL,)
DAVID E. MCCALL, JR.,)
THOMAS C. MCCULLY,)
 aka "Cully,")
LAMAR L. MIDDLETON,)
EUGENE MILLER,)
 aka "Joker,")
SANDRA L. MILLER,)
VINCENT MORGAN,)
EDWARD F. NIX,)
DAMMARKRO SHERRON NOLAN, SR.,)
 aka "Money,")
 aka "Marco,")

BRENDA H. NORMAN,)
VERNON O. NORMAN,)
ANTWONE NOWDEN,)
IVAN PERCY,)
ERIC C. POWELL,)
ROLANDO J. REED,)
 aka "Chill,")
GREGORY T. SAVAGE, SR.,)
KEVIN M. SCOTT,)
 aka "Drew,")
JAMEZ JAMEL WEBB II,)
 aka "Mez,")
JAMAL H. WILLIAMS,)
SHAUN D. WILLIAMS,)
RAYMUNDO D. WREN,)
 Defendants.)
)

COUNT 1

The Grand Jury charges:

Beginning at least as early as September 2011, and continuing until at least on or about September 11, 2013, in the Northern District of Ohio, Eastern Division, and elsewhere, KEITH RICKS, aka "K-Mack," MACEO MOORE, aka "Chase," aka "Paper," MAURICE GOLSTON, aka "Reese," LEAMON SHEPHARD, aka "Juice," MARCUS BLUE, aka "Blue," DIONTE THOMPSON, aka "Dionte Ricks," aka "Pringles," CARL D. AKINS, DARNELL ALEXANDER, JR., BRANDY M. BATES, aka "Weezy," BENEDITTO A. BELFIORE, aka "Ditto," ROBERT BELK, STEVENSON BLACK, aka "Black," DOMINIQUE A. BLAIR, LATRICE N. BLEVINS, MICHAEL BUCHANAN, aka "Israel," PIERRE A. CAMPBELL,

FREDERICK L. DARLING, aka "Freddy Fox," JACOB O. DERRICKSON, DANA M. ERVIN, ANTWON EVANS, aka "Twon," FREDERICK FERRELL, aka "Little Fred," TERRANCE L. FLETCHER, aka "Black T," ROBERT L. FOWLKES, JR., JOVAN FUSSELL, JERMAINE D. GRAYSON, LACHELLE T. HALL, GREGORY HAMILTON, aka "Duke," KENNETH E. HARRIS, RYLAND L. HARRIS, JR., aka "Slim," DAVID D. HARSLEY, ERIAN J. HARWELL, CARLTON A. HIGDON, DOMINIQUE E. IVORY, DOUGLAS T. JOHNSON, LUTHER B. JOHNSON, MICHAEL L. JONES, aka "Monk," ANDREW E. LOVING, DEVONTA P. MAXWELL, DAVID E. MCCALL, JR., THOMAS C. MCCULLY, aka "Cully," LAMAR L. MIDDLETON, EUGENE MILLER, aka "Joker," SANDRA L. MILLER, VINCENT MORGAN, EDWARD F. NIX, DAMMARKRO SHERRON NOLAN, SR., aka "Money," aka "Marco," BRENDA H. NORMAN, VERNON O. NORMAN, ANTWONE NOWDEN, IVAN PERCY, ERIC C. POWELL, ROLANDO J. REED, aka "Chill," GREGORY T. SAVAGE, SR., KEVIN M. SCOTT, aka "Drew," JAMEZ JAMEL WEBB II, aka "Mez," JAMAL H. WILLIAMS, SHAUN D. WILLIAMS, and RAYMUNDO D. WREN, the defendants herein, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree together and with each other, and with A.M., L.E., J.J., and L.H., individuals known to the Grand Jury but not charged herein, and diverse others known and unknown to the Grand Jury, to possess with intent to distribute and to distribute a mixture or substance containing a detectable amount of heroin. As to defendants KEITH RICKS, aka

"K-Mack," MACEO MOORE, aka "Chase," aka "Paper," MAURICE GOLSTON, aka "Reese," LEAMON SHEPHARD, aka "Juice," MARCUS BLUE, aka "Blue," DIONTE THOMPSON, aka "Dionte Ricks," aka "Pringles," CARL D. AKINS, DARNELL ALEXANDER, JR., BRANDY M. BATES, aka "Weezy," ROBERT BELK, LATRICE N. BLEVINS, MICHAEL BUCHANAN, aka "Israel," PIERRE A. CAMPBELL, FREDERICK L. DARLING, aka "Freddy Fox," DANA M. ERVIN, ANTWON EVANS, aka "Twon," FREDERICK FERRELL, aka "Little Fred," TERRANCE L. FLETCHER, aka "Black T," ROBERT L. FOWLKES, JR., JOVAN FUSSELL, JERMAINE D. GRAYSON, GREGORY HAMILTON, aka "Duke," KENNETH E. HARRIS, RYLAND L. HARRIS, JR., aka "Slim," DAVID D. HARSLEY, ERIAN J. HARWELL, CARLTON A. HIGDON, DOMINIQUE E. IVORY, DOUGLAS T. JOHNSON, LUTHER B. JOHNSON, MICHAEL L. JONES, aka "Monk," ANDREW E. LOVING, DEVONTA P. MAXWELL, DAVID E. MCCALL, JR., THOMAS C. MCCULLY, aka "Cully," LAMAR L. MIDDLETON, EUGENE MILLER, aka "Joker," SANDRA MILLER, VINCENT MORGAN, EDWARD F. NIX, DAMMARKRO SHERRON NOLAN, SR., aka "Money," aka "Marco," BRENDA H. NORMAN, VERNON O. NORMAN, ANTWONE NOWDEN, IVAN PERCY, ERIC C. POWELL, ROLANDO J. REED, aka "Chill," GREGORY T. SAVAGE, SR., KEVIN M. SCOTT, aka "Drew," JAMEZ JAMEL WEBB II, aka "Mez," JAMAL H. WILLIAMS, SHAUN D. WILLIAMS, and RAYMUNDO D. WREN, those defendants conspired to possess with intent to distribute and to distribute at least 1 kilogram or more of a mixture or substance

containing a detectable amount of heroin in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A). As to defendants BENEDITTO A. BELFIORE, aka "Ditto," STEVENSON BLACK, aka "Black," DOMINIQUE A. BLAIR, JACOB O. DERRICKSON, and LACHELLE T. HALL, those defendants conspired to possess with intent to distribute and to distribute a mixture or substance containing a detectable amount of heroin in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

MANNER AND MEANS OF THE CONSPIRACY

A. It was part of the conspiracy to distribute heroin to dealers and users in the Cleveland, Ohio area that co-conspirators obtained from suppliers in the Chicago, Illinois; Atlanta, Georgia; and Cleveland, Ohio areas and elsewhere. The co-conspirators concentrated their heroin distribution on the east side of Cleveland.

B. It was further part of the conspiracy that A.M., assisted by L.E., and L.H., and JOVAN FUSSELL obtained large quantities of heroin from suppliers in the Chicago, Illinois area and transported the heroin to Cleveland, Ohio, where it was distributed to heroin dealers such as KENNETH E. HARRIS, GREGORY HAMILTON, DAVID E. MCCALL, JR., PIERRE A. CAMPBELL, and others.

C. It was further part of the conspiracy that KEITH RICKS, BRANDY M. BATES, and DAMMARKRO SHERRON NOLAN, SR.,

obtained heroin from suppliers in the Atlanta, Georgia area and then transported the heroin to Cleveland in the mail or by car. LACHELLE T. HALL assisted BRANDY M. BATES and KEITH RICKS in transporting heroin from Atlanta to Cleveland. MAURICE GOLSTON, DIONTE THOMPSON, LEAMON SHEPHARD, and KEITH RICKS pooled their money together for RICKS to obtain heroin for them in Atlanta. RICKS also obtained heroin from DAMMARKRO SHERRON NOLAN, SR., GREGORY HAMILTON, and other sources in the Cleveland, Ohio area.

D. It was further part of the conspiracy that KEITH RICKS distributed the heroin to other heroin traffickers in Cleveland, Ohio, including LEAMON SHEPHARD, MAURICE GOLSTON, MARCUS BLUE, MACEO MOORE, GREGORY HAMILTON, and ROBERT BELK.

E. It was further part of the conspiracy that LEAMON SHEPHARD obtained heroin from KEITH RICKS and other suppliers, and then distributed the heroin, with the assistance of MICHAEL L. JONES, to heroin distributors including EUGENE MILLER, DOMINIQUE A. BLAIR, DOMINIQUE E. IVORY, MARCUS BLUE, ANTWON EVANS, JERMAINE D. GRAYSON, DANA M. ERVIN, ROBERT L. FOWLKES, JR., DEVONTA P. MAXWELL, BENEDITTO A. BELFIORE, and JACOB O. DERRICKSON. JERMAINE D. GRAYSON, ANTWON EVANS, and MARCUS BLUE also supplied heroin to SHEPHARD.

F. It was further part of the conspiracy that MACEO MOORE obtained heroin from KEITH RICKS and from other sources and then

distributed heroin to JAMEZ JAMEL WEBB II, ROLANDO J. REED, and others. TERRANCE FLETCHER also obtained heroin from MACEO MOORE and further distributed heroin.

G. It was further part of the conspiracy that KENNETH E. HARRIS re-distributed the heroin he obtained from A.M. to FREDERICK L. DARLING, STEVENSON BLACK, KEVIN M. SCOTT, GREGORY T. SAVAGE, SR., TERRANCE L. FLETCHER, and other heroin dealers. Following the arrest of A.M. in October 2012, it was further part of the conspiracy that HARRIS obtained heroin from other sources of supply, including EDWARD F. NIX, who also distributed heroin to other dealers, such as DOUGLAS T. JOHNSON.

H. It was further part of the conspiracy that FREDERICK L. DARLING supplied heroin to EUGENE MILLER, THOMAS C. MCCULLY, LUTHER B. JOHNSON, VERNON O. NORMAN, BRENDA H. NORMAN, and others for re-distribution. VERNON O. NORMAN and BRENDA H. NORMAN also introduced new customers to EUGENE MILLER to facilitate the distribution of heroin.

I. It was further part of the conspiracy that EUGENE MILLER obtained heroin for re-distribution and for personal use from other suppliers of heroin such as LUTHER B. JOHNSON, ERIAN J. HARWELL, LEAMON SHEPHARD, and ANDREW E. LOVING.

J. It was further part of the conspiracy that ANDREW E. LOVING and JAMAL H. WILLIAMS worked together to distribute heroin.

K. It was further part of the conspiracy that THOMAS C. MCCULLY obtained heroin from other suppliers of heroin such as MICHAEL BUCHANAN and FREDERICK FERRELL.

L. It was further part of the conspiracy that GREGORY T. SAVAGE, SR. distributed heroin to SHAUN D. WILLIAMS and other heroin dealers, who would then re-distribute the heroin.

M. It was further part of the conspiracy that DAVID E. MCCALL, JR. and LATRICE N. BLEVINS worked together to distribute heroin to other heroin distributors. Specifically, MCCALL and BLEVINS distributed heroin to PIERRE A. CAMPBELL and RAYMUNDO D. WREN.

N. It was further part of the conspiracy that DAVID E. MCCALL, JR. sold heroin to CARL D. AKINS, who redistributed the heroin to others.

O. It was further part of the conspiracy that PIERRE A. CAMPBELL and LAMAR L. MIDDLETON sold heroin to each other in order to ensure that each had a ready supply of heroin for resale. LAMAR L. MIDDLETON supplied heroin to both users and other distributors.

P. It was further part of the conspiracy that PIERRE A. CAMPBELL supplied heroin to VINCENT MORGAN, ANTWONE NOWDEN, DAVID D. HARSLEY, SANDRA L. MILLER, IVAN PERCY, DARNELL ALEXANDER, JR., ERIC C. POWELL, RYLAND L. HARRIS, JR., and CARLTON A. HIGDON, which they then distributed to others.

Q. It was further part of the conspiracy that in order to fund their drug trafficking, to obtain heroin and other controlled substances, and to collect drug-related debts, co-conspirators, including KEITH RICKS, MACEO MOORE, LEAMON SHEPHARD, MARCUS BLUE, MAURICE GOLSTON, DAMMARKRO SHERRON NOLAN, SR., and others planned and committed burglaries, robberies and thefts from other drug dealers or drug customers, and each other. Co-conspirators sold the heroin or other controlled substances at a discounted price. Co-conspirators used the stolen money and other valuables to fund the purchase of heroin for further distribution. Co-conspirators identified potential robbery victims through word of mouth, by observing victims who appeared to have an expensive car or jewelry, by conducting drug transactions directly with the victims prior to a robbery, or by using women who would gather information about potential victims and report back to the conspirators. Co-conspirators conducted surveillance of target locations before committing a robbery. Co-conspirators shared information about potential targets with

each other. When committing these robberies, burglaries, and thefts from other drug traffickers, co-conspirators sometimes used weapons and zip ties to restrain victims.

R. It was further part of the conspiracy that the co-conspirators conducted counter-surveillance of law enforcement, shared information with each other about law enforcement presence, and posted sentries to watch for law enforcement and notify conspirators when law enforcement was spotted.

S. It was further part of the conspiracy that the co-conspirators shared information about drug traffickers who had been arrested and obtained court documents regarding the details of drug traffickers' court cases to warn conspirators not to conduct business with the drug traffickers who had been arrested.

T. It was further part of the conspiracy that the co-conspirators conducted drug trafficking activity by using telephones to make and receive telephone calls and to send and receive text or other electronic messages. To reduce the risk of being detected by law enforcement, and to conceal the identity of the person using the device, co-conspirators often used cellular telephones that had been obtained in the names of other persons or in fictitious names. It was further part of the conspiracy that the co-conspirators, when using cellular phones

or text messaging to conduct drug trafficking activity, used slang terms, street terminology, or code words or phrases to obscure and to disguise the true nature of their activities and the true meaning of their conversations. Members of the conspiracy also sometimes shared cellular phones and shared the profits of drug sales that resulted from using those phones.

U. It was further part of the conspiracy that some of the co-conspirators would possess and use firearms or other weapons to protect their drug trafficking activities and to commit robberies, burglaries, and home invasions of other drug traffickers.

OVERT ACTS

In furtherance thereof, and to effect the goals and conceal the existence of the conspiracy, the defendants and others performed overt acts in the Northern District of Ohio and elsewhere, including, but not limited to, the following:

1. On or about September 14, 2011, at approximately 2:24 p.m., VERNON O. NORMAN had a conversation with a confidential informant on the telephone. During the call, the informant said, "So that's why I was telling you just, do what you, 'cause it's only, wanna do eight (\$80 per gram of heroin). For the brown (heroin)?" VERNON O. NORMAN replied, "It might go for that." The informant said, "Okay, you, you got, I ain't got

time to be wickey-wickey and now. I mean, you know." VERNON O. NORMAN said, "Just give me nine (\$90 per gram of heroin), I know that. Just give me nine (\$90 per gram of heroin). Give me nine (\$90 per gram) for the brown (heroin). If it be any different, I do it, and it shouldn't be no different. I, if do, I just won't get it, that's all." The informant agreed, "Okay, hey check this out. Okay, you got nine on you. ..."

2. On or about September 14, 2011, at approximately 3:38 p.m., VERNON O. NORMAN and a confidential informant had a conversation on the telephone. During the conversation, VERNON O. NORMAN asked, "You don't want to take a dog (heroin) on a test run (try a sample of the heroin), do ya? You don't?" The confidential informant replied, "I'll get it done. I know how I'm doing that. Uh-huh. Jason is waiting to do that for me (test the heroin). That's why I gotta, I gotta catch a train down to the airport, so I'm gonna grab it from you, get Jason to do what he gotta do (test the heroin) and then I'm gonna go on down there cause I gotta catch the thirty nine (bus). Huh?" Later in the conversation, after the confidential informant explained about catching the train and when they would meet, the confidential informant said, "So when you see me, just have it (heroin), and I'll give you your cash. You go on." VERNON O. NORMAN replied, "Okay, okay."

3. On or about September 16, 2011, VERNON O. NORMAN met with an undercover officer and agreed to sell the undercover officer one ounce of heroin.

4. On or about September 19, 2011, VERNON O. NORMAN met with an undercover officer in order to sell the undercover officer one ounce of heroin. VERNON O. NORMAN told the undercover officer that the money would have to be provided immediately, but VERNON O. NORMAN would provide the heroin to the undercover officer the next day. The undercover officer demanded the heroin be provided at the same time VERNON O. NORMAN received the money. VERNON O. NORMAN then called BRENDA H. NORMAN to find out if she had the heroin available. BRENDA H. NORMAN told VERNON O. NORMAN she would check into it.

5. On or about September 22, 2011, EUGENE MILLER and BRENDA H. NORMAN distributed approximately 27.64 grams of heroin that had been supplied by LEAMON SHEPHARD to an undercover officer at MILLER's residence on Bryant Avenue in Cleveland, Ohio.

6. On or about November 14, 2011, EUGENE MILLER and BRENDA H. NORMAN sold approximately 27.84 grams of heroin supplied by FREDERICK L. DARLING to an undercover officer at MILLER's residence on Bryant Avenue in Cleveland, Ohio.

7. On or about November 14, 2011, FREDERICK L. DARLING possessed approximately 2.75 grams of heroin and \$5,700 in cash.

8. On or about November 21, 2011, EUGENE MILLER sold approximately 25.84 grams of heroin to an undercover officer.

9. On or about November 22, 2011, GREGORY HAMILTON possessed a hydraulic press used for compressing heroin, heroin cutting agent, and heroin residue in Bedford, Ohio.

10. On or about January 12, 2012, DAVID E. MCCALL, JR. sold .4 grams of heroin to a confidential informant in Cleveland, Ohio.

11. On or about January 18, 2012, DAVID E. MCCALL, JR., and RAYMUNDO D. WREN were in a home with 192.66 grams of heroin, 48.5 grams of cocaine, a .380 caliber Llama handgun, a digital scale with heroin residue, a food chopper with heroin residue, and a drug press with heroin residue.

12. On or about June 4, 2012, EUGENE MILLER sold approximately 27.44 grams of heroin to an undercover officer at MILLER's residence on Bryant Avenue in Cleveland, Ohio.

13. On or about June 12, 2012, MACEO MOORE made the following statements to an undercover officer:

- (a) When asked by the undercover officer about robbing other drug dealers, MOORE engaged in the following exchange:

QUESTION: You guys did it a lot?

MOORE: Yeah, that was our job, kicking doors.

QUESTION: How many days did you work?

MOORE: We worked every day, around the clock. If you had it, and we wanted it, we was coming to get it.

QUESTION: For how many years?

MOORE: S**t, It ain't never, it don't stop. That's what it was, that's what it is.

- (b) MOORE was asked how he and his associates chose their robbery targets. MOORE explained that it was routine for he and his associates to identify robbery targets who boasted about, or flaunted, the wealth that they had accumulated through drug trafficking. MOORE explained that on certain occasions, they would solicit the assistance of "a female," who would befriend their target, and attempt to manipulate the target to provide her with personal information that MOORE could use to decide when, where, and how to follow through on their plans to rob him. MOORE concluded by saying, "Now we know where he live at, we gonna go pay him a visit." He added, "It's like, I could see a dude at the club. He buying and poppin'

bottles, he got his jewelry on, he on the list, he gonna get it."

(c) MOORE was asked about how many people he would bring with him when committing a robbery. MOORE replied, "One or two. 'Cause like I said, anything can go wrong. I ain't takin' no ten guys on me to do nothing like that. Going into them situations, the average dude don't have it in his head, 'we going in to kill.' But, it can lead to that. Anything can go wrong in a robbery."

(d) MOORE was asked how much money can be made selling drugs. MOORE replied, "You can make a million dollars!" He added, "I sold drugs, but I started getting more money when I started taking from the drug dealers. That's how, honestly, that's how I got my money. I sold drugs, but I always been the hustler, so I sold drugs, I find out such and such over here got it, they doing good, well, we going to get that. Flat out, we going to get it." MOORE was then asked if these robberies were committed to steal money, or to steal drugs. MOORE replied, "Whatever they got. Money, jewelry, drugs, whatever they got, we going to

get it. Flatout." MOORE confirmed he used stolen money to purchase the drugs that he sold. MOORE also clarified that the drugs he sold were usually stolen drugs, stating, "No, actually, when I got them drugs for sale, I gave them away on a discount, when I got they drugs for sale. For real."

14. On or about June 15, 2012, PIERRE A. CAMPBELL possessed a loaded Beretta 9mm semi-automatic handgun bearing serial number PZ24341 and 170.5 grams of heroin in Euclid, Ohio.

15. On or about August 8, 2012, at approximately 12:41 p.m., EUGENE MILLER called LUTHER B. JOHNSON on the telephone. During the conversation, MILLER stated, "Yeah, what's happenin'?" JOHNSON answered, "What 'posed to be happenin'?" MILLER replied, "I don't know, s**t. I'm just asking you, s**t, n***a. I'm getting ready to head over there." JOHNSON stated, "Yeah, for what?" MILLER's reply was unintelligible. JOHNSON stated, "You ain't come get my motherf**king clothes, mother f**ker, you was supposed to came got 'em." MILLER stated, "Well, I get the motherf**kers today." JOHNSON replied, "Yeah, cuz you want something (heroin). That's all it is. Any time you want something (heroin), that's the only time you come around, when you want something, man." MILLER replied, "That's

bulls**t, man! . . ." Later in the conversation, MILLER stated, "Me and you got some business going. Uh, which ain't got nothing to do with what I'm doing with . . ." JOHNSON replied, "We, um- we, um- how in the f**k we got business going, motherf**ker, when you only come around when you want something (heroin)?"

16. On or about August 8, 2012, at approximately 6:35 p.m., LUTHER B. JOHNSON called EUGENE MILLER on the telephone. JOHNSON stated, "Yeah, man, I'm fittin' to come out, man (to sell heroin to MILLER)." MILLER replied, "Oh, alright, call me when you get in the driveway, alright?"

17. On or about August 11, 2012, at approximately 12:22 p.m., LUTHER B. JOHNSON called EUGENE MILLER on the telephone. During the conversation, MILLER stated, "What's up, killa?" JOHNSON answered, "Man, you bring my s**t (money) today, man?" MILLER replied, "What is you talkin' about, n***a? I called you yesterday." Later in the conversation, JOHNSON stated, "Hey, man, I told you, man, about to come get those f**kin' clothes, man, see, man, you full of s**t, man." MILLER replied, "Nah." JOHNSON stated, "You done got what you wanted (heroin) and didn't come get them f**kin clothes, Hubert (JOHNSON)." MILLER stated, "N***er, I been by there yesterday, go ahead on."

18. On or about August 13, 2012, at approximately 12:43 p.m., EUGENE MILLER called FREDERICK L. DARLING on the telephone. During the conversation, MILLER told DARLING that his cousin came in from out of town. MILLER stated that he wanted "to come over there and holler at you (to purchase heroin)." DARLING stated, "Alright, I'm down (have heroin with me at my house)." MILLER replied, "Okay, I'm about to head that way in, ah, ten minutes."

19. On or about August 13, 2012, at approximately 1:29 p.m., an undercover officer spoke with EUGENE MILLER on the telephone and arranged to purchase two ounces of heroin from MILLER for \$6,400. Shortly thereafter, at approximately 2:10 p.m., EUGENE MILLER drove from his residence to FREDERICK L. DARLING's residence on Linwood Avenue, in Cleveland, Ohio, to obtain heroin. MILLER entered DARLING's residence and purchased approximately 53.47 grams of heroin from DARLING. MILLER then returned to his own residence where he sold the heroin to the undercover officer.

20. On or about August 14, 2012, at approximately 10:48 a.m., EUGENE MILLER called LUTHER B. JOHNSON on the telephone and told him that he was coming to see him soon (to purchase heroin).

21. On or about August 15, 2012, at approximately 9:43 a.m., an undercover officer contacted EUGENE MILLER on the telephone to arrange the purchase of two ounces of heroin from MILLER. Almost immediately afterward, at approximately 9:44 a.m., EUGENE MILLER called FREDERICK L. DARLING on the telephone. During the conversation, MILLER stated, "Yeah, we gotta have lunch again today (meet for a heroin transaction)." Did- did BRENDA (NORMAN) uh, did you want BRENDA to look up somethin'?" DARLING answered, "Yeah, I got them papers, where she at?" MILLER replied, "She at work now." DARLING stated, "Yeah, I need to get them papers, damn, I was just over the scrap yard, s**t." MILLER replied, "Hey, well, I got to come right over (to buy heroin), soon as I get off work, you know?" DARLING answered, "Alright." MILLER replied, "Yeah, same, (two ounces of heroin) have lunch so, we havin' lunch (we are going to meet)." DARLING asked, "That's the quarter?" MILLER answered, "Okay." DARLING asked, "But hey?" MILLER answered, "Yeah?" DARLING asked, "What's happenin' (how much heroin do you want)?" MILLER stated, "Same thing (two ounces of heroin)." DARLING asked, "Same, like, same sandwiches (same quantity and type of heroin)?" MILLER answered, "Yep, yeah." DARLING stated, "Alright."

22. On or about August 15, 2012, at approximately 1:27 p.m., BRENDA H. NORMAN called THOMAS C. MCCULLY on the telephone and left him a voice message which stated, "Hey, Cully, this is BRENDA, call Joker's (EUGENE MILLER's) phone so we can find out where and when we can go to get those mattresses (two ounces of heroin). Call, OK? Bye." Later that day, FREDERICK L. DARLING supplied EUGENE MILLER with approximately 54.76 grams of heroin, which MILLER then sold to an undercover officer.

23. On or about August 17, 2012, at approximately 3:14 p.m., EUGENE MILLER called ERIAN J. HARWELL on the telephone. During the conversation, MILLER stated, "You know I made some money (from selling heroin), right? And I'm--I'm so glad that I made this money now I got all this time off and you know? I ain't too much worried 'cause I'm sitting on some little bank, ya know?"

24. On or about August 18, 2012, at approximately 11:31 a.m., EUGENE MILLER called ERIAN J. HARWELL on the telephone. During the conversation, MILLER stated, "What's up, big dog? You tha man, come and see me." HARWELL responded, "What you talking about (how much heroin)? So I can get you together (so I can have it ready for you)?" MILLER responded, "40 (\$40 worth of heroin)." HARWELL answered, "Yep." and MILLER again said, "40 (\$40 worth of heroin)." HARWELL stated, "Alright." and

MILLER asked, "Alright, how long?" HARWELL replied, "I'm on my way right now." MILLER stated, "OK."

25. On or about August 20, 2012, at approximately 11:25 a.m, EUGENE MILLER called ERIAN J. HARWELL on the telephone. During the conversation, HARWELL asked, "What's up with it (How much heroin do you need)?" MILLER replied, "20 (\$20 worth of heroin)." They agreed to meet later that day. On August 20, 2012, at approximately 3:10 p.m., EUGENE MILLER and ERIAN J. HARWELL met at MILLER's residence to conduct the heroin transaction.

26. On or about August 21, 2012, L.E. and L.H., at the direction of A.M., individuals known to the Grand Jury but not charged herein, picked up approximately 5.658 kilograms of heroin in Joliet, Illinois, for the purpose of transporting the heroin to Cleveland, Ohio, for distribution by the co-conspirators named herein.

27. On or about August 23, 2012, at approximately 11:39 a.m., EUGENE MILLER called ERIAN J. HARWELL on the telephone, and asked HARWELL to come meet him. HARWELL asked, "What you talking about (how much heroin do you want)?" and MILLER responded, "40 (\$40 worth of heroin)." On August 23, 2012, at approximately 11:59 a.m., EUGENE MILLER received a call from ERIAN J. HARWELL, who stated that he was outside.

28. On or about August 26, 2012, at approximately 11:46 a.m., EUGENE MILLER called ERIAN J. HARWELL on the telephone. During the conversation, MILLER asked if HARWELL could come meet with him. HARWELL asked, "What (how much heroin) you want?" and MILLER responded, "40 (\$40 worth of heroin)." HARWELL agreed to come to MILLER's residence.

29. On or about August 27, 2012, at approximately 12:35 p.m., EUGENE MILLER called ERIAN J. HARWELL and asked if HARWELL could come see him. HARWELL asked, "What you talking about?," and MILLER responded, "40 (\$40 worth of heroin)." HARWELL agreed to come to MILLER's residence.

30. On or about August 27, 2012, at approximately 12:59 p.m., FREDERICK L. DARLING had a conversation with an unknown person on the telephone. During that conversation, the unknown person asked, "Oh, what up with it (do you have heroin for sale)? Where you at?" DARLING answered, "Down here at the house." The other person replied, "Okay. I'm about to come down there (to purchase heroin)." DARLING stated, "Alright."

31. On August 28, 2012, at approximately 11:23 a.m., EUGENE MILLER spoke with an undercover officer. MILLER agreed to sell two ounces of heroin to the undercover officer. A short time later, at approximately 11:31 a.m., MILLER called BRENDA H.

NORMAN on the telephone and asked her to pick him up because they had "work to do (heroin to sell) this afternoon."

32. On or about August 28, 2012, at approximately 12:02 p.m., EUGENE MILLER called THOMAS C. MCCULLY on the telephone in an attempt to locate heroin to sell to the undercover officer. During the conversation, MILLER asked where "the Big Man" (FREDERICK L. DARLING) was. MCCULLY responded that "the Big Man" was in the area with him. MILLER stated that he (MILLER) was coming to meet him (DARLING). At approximately 12:18 p.m., MILLER then met with DARLING in Cleveland, Ohio.

33. On or about August 28, 2012, at approximately 12:23 p.m., EUGENE MILLER called ERIAN J. HARWELL on the telephone to attempt to obtain heroin. During the conversation, MILLER told HARWELL that he needed to speak with him very soon at MILLER's house. HARWELL asked the reason, and MILLER responded, "It's time to do some business (sell heroin). Time to talk." HARWELL said, "I'm meetin' my people. . . I'm meeting my other. . . I'm, I'm, I'm making a drop off (selling some heroin) and then I'll come to you." MILLER stated, "Ok. Hey, we gonna, uhh, it's a, we gotta, we gotta talk so you need to get here as soon as you can." HARRELL responded that he already knew what was up.

34. On or about August 28, 2012, at approximately 12:53 p.m., ERIAN J. HARWELL called EUGENE MILLER on the telephone. During the conversation, HARWELL asked whether MILLER still needed HARWELL to come by his house. MILLER stated that he did. HARWELL asked, "What you had, what you had wanted me to bring (what quantity of heroin)?" MILLER told him, "Bring the usual. ... Forty. (\$40 worth of heroin)." HARWELL arrived at MILLER's residence on Bryant Avenue, in Cleveland, Ohio, at approximately 1:13 p.m.

35. On or about August 28, 2012, at approximately 1:16 p.m., EUGENE MILLER called the undercover officer and stated, "I only could locate one, the one of 'em (one ounce of heroin)." They discussed a price, and MILLER agreed that the price was \$3,200 for an ounce of heroin. MILLER asked the undercover officer to come to his house in an hour.

36. On or about August 28, 2012, at approximately 1:18 p.m., EUGENE MILLER called ERIAN J. HARWELL on the telephone. During the conversation, MILLER told HARWELL, "Hey, go on and do that (obtain the heroin) and come on, get on back here." HARWELL asked, "You want me to bring all, all three of 'em or just one (three ounces or one ounce of heroin)?" MILLER told him to bring one ounce. MILLER further stated, "I got the ruler (scale for weighing the heroin)."

37. On or about August 28, 2012, at approximately 2:27 p.m., ERIAN J. HARWELL arrived at MILLER's residence. After the undercover officer gave MILLER \$3,200 to complete the purchase of heroin, MILLER met with HARWELL in the driveway of the residence and obtained an ounce of heroin from HARWELL. MILLER then sold approximately 28.19 grams of heroin to the undercover officer.

38. On or about August 28, 2012, at approximately 5:12 p.m., LUTHER B. JOHNSON called EUGENE MILLER on the telephone. During the conversation, MILLER stated, "I was seeing if you still at home I, I, want to come see that (obtain heroin)." JOHNSON told MILLER that he was at home.

39. On or about August 29, 2012, at approximately 12:18 p.m., EUGENE MILLER spoke with an undercover officer. MILLER stated, "I was getting ready to get dude together and grab that other one (an ounce of heroin)." MILLER said he would call when it was ready.

40. On or about August 29, 2012, at approximately 12:41 p.m., EUGENE MILLER called ERIAN J. HARWELL on the telephone. During the conversation, MILLER asked, "Are we gonna do that today (sell the ounce of heroin)?" HARWELL replied, "I'm in Akron. . . I'll be trying to get it, man." MILLER told HARWELL, "When you getting back, man, ah, get that together

(prepare the ounce of heroin), you know, and mine- mines too, you know, the side thing (set aside an additional quantity of heroin for MILLER) . . . so you won't have to be doubling back and s**t (making two trips to MILLER's residence)." HARWELL asked, "Right, so he, uh, he wanted another one of those (another ounce of heroin)?" MILLER told him that he did, and that he was trying to arrange the transaction for 3:00 p.m. that day. HARWELL stated, "I'll call you when I'm on my way back and let you know for sure."

41. On or about August 29, 2012, at approximately 1:04 p.m., LUTHER B. JOHNSON called EUGENE MILLER on the telephone and asked MILLER for THOMAS C. MCCULLY's telephone number.

42. On or about August 29, 2012, at approximately 1:20 p.m., ERIAN J. HARWELL called EUGENE MILLER on the telephone. During the conversation, HARWELL stated, "I'm gonna bring you something over there I want you to, uh . . . I got some newer s**t (heroin)- I want you to try it out. Suppose' to be fire (high quality heroin)." They agreed to meet at MILLER's house.

43. On or about August 29, 2012, at approximately 1:46 p.m., ERIAN J. HARWELL called EUGENE MILLER on the telephone. During the conversation, HARWELL stated, "I'm about to bring you something through over there. I want you to try it out for me (test a sample of the heroin to determine its quality)." MILLER

agreed and asked, "You got everything else together, right (the ounce of heroin prepared for sale)?" HARWELL responded, "I need you to see what's up (test the quality of the heroin) for, before I even, I'm on my way right now before I even issue it out (sell the heroin) to anybody else." HARWELL asked how long it would take for MILLER to test it, and MILLER stated, "It will take me no time."

44. On or about August 29, 2012, at approximately 1:56 p.m., ERIAN J. HARWELL met with EUGENE MILLER at his residence, wherein MILLER tested the quality of the heroin HARWELL brought.

45. On or about August 29, 2012, at approximately 3:33 p.m., EUGENE MILLER spoke with the undercover agent and discussed the status of the proposed sale of one ounce of heroin. MILLER stated that there was a "little delay." Later in the conversation, MILLER stated, "I just made an inquiry (tested the heroin) . . . and it ain't up to par (the heroin was not good quality)."

46. On or about August 29, 2012, at approximately 3:44 p.m., EUGENE MILLER called ANDREW E. LOVING on the telephone to ask about a quantity of heroin. During the conversation, LOVING stated that he "just got 'em (the heroin)" but stated that "I ain't put them together (repackaged the heroin for sale) yet" because he didn't have his "tools" with him. LOVING stated that

he did not want to ride around with "tools." MILLER stated that all he wanted was "a little handful." LOVING asked MILLER if he had a "tool (scale)" and MILLER stated that he did. LOVING responded, "You got a tool, we can do it." MILLER asked, "When you gonna come over my house, then?" LOVING answered, "Uhhh, well you, maybe we need to be there now then man, 'cuz I can't, can't keep riding around dirty (driving with heroin in his vehicle) like this, man." The two agreed to meet at MILLER's residence.

47. On or about August 30, 2012, at approximately 11:57 a.m., EUGENE MILLER called BRENDA H. NORMAN on the telephone. During the conversation, MILLER told NORMAN that he was going to pick her up soon because "we gotta grab some (obtain a quantity of heroin)."

48. On or about August 30, 2012, between approximately 12:07 p.m. and 12:30 p.m., EUGENE MILLER made multiple telephone calls to ERIAN J. HARWELL and THOMAS C. MCCULLY in an attempt to locate one ounce of heroin for distribution, but they did not answer their telephones.

49. On or about August 30, 2012, at approximately 12:12 p.m., EUGENE MILLER received a telephone call from LEAMON SHEPHARD. During the conversation, MILLER told SHEPHARD, "I was trying to get with you (to obtain a quantity of heroin)."

SHEPHARD agreed that he would "pump that s**t out to you today (deliver a quantity of heroin to MILLER)."

50. On or about August 30, 2012, at approximately 12:36 p.m., EUGENE MILLER spoke with LUTHER B. JOHNSON on the telephone. During the conversation, MILLER stated that he was still trying "to get it together (obtain an ounce of heroin)." JOHNSON laughed, and MILLER stated, "Listen, it's very hard, too." JOHNSON asked what MILLER meant, and MILLER said, "Findin' it. Putting it together." JOHNSON responded, "No it ain't. No it ain't." MILLER asked, "You know what I was talking about yesterday?" JOHNSON responded, "Talking about, yeah, your dude." MILLER said that was correct, and JOHNSON said, "Yeah, I told you. It ain't hard to find (heroin), bro. No, it ain't hard to find." MILLER stated that he might have to go see JOHNSON (to purchase the heroin from him). JOHNSON told MILLER, "You gotta find some figures out (discuss a price) and then, and then I tell you exactly 'cause, uh, well, like, man, there ain't no talkin' on the phone (we shouldn't be discussing heroin sales on the phone), but anyway." JOHNSON ended the call by telling MILLER that he was at home.

51. On or about August 30, 2012, at approximately 1:20 p.m., LEAMON SHEPHARD called EUGENE MILLER on the telephone. During the conversation, MILLER told SHEPHARD that he needed "28

(an ounce of heroin)." SHEPHARD asked whether MILLER had "28 dollars (do you have enough money for the ounce of heroin)?" and MILLER confirmed that he did. MILLER re-confirmed that he wanted "28, the whole (a whole ounce of heroin)." SHEPHARD confirmed that he understood what MILLER wanted. SHEPHARD asked, "Um, this for you?" MILLER responded, "Yeah, same dude from last time." SHEPHARD asked, "The dude from out of town?" and MILLER confirmed it was. SHEPHARD stated that he was, "About to get everything ready right now. I'm talking about making you something." MILLER asked SHEPHARD if he could provide MILLER with "eight or half of something on the side, (a quantity of heroin for MILLER)" and SHEPHARD stated, "Alright, I got you."

52. On or about August 30, 2012, at approximately 2:00 p.m., EUGENE MILLER called ERIAN J. HARWELL on the telephone. During the conversation, MILLER asked, "Man, where you been?" HARWELL stated, "Man, I had to give that s**t (heroin) back. I'm on the wait now (waiting for more heroin) . . . I couldn't do nothing with that s**t (the heroin was poor quality and he couldn't sell it to anyone), man, and I ain't about to be stuck with it." MILLER told HARWELL that he was working with "Juice" (LEAMON SHEPHARD) to obtain heroin, and HARWELL told MILLER that SHEPHARD had received the same bad supply of heroin that he had.

53. On or about August 30, 2012, at approximately 2:45 p.m., EUGENE MILLER called LEAMON SHEPHARD on the telephone and they discussed a time and place to meet to complete the sale of one ounce of heroin.

54. On or about August 30, 2012, at approximately 3:11 p.m., EUGENE MILLER and LEAMON SHEPHARD met in front of a house on East 115th Street, in Cleveland, Ohio.

55. On or about August 30, 2012, at approximately 5:39 p.m., EUGENE MILLER received a telephone call from LEAMON SHEPHARD, who asked MILLER if he and his customer were "ready (to purchase the heroin)." MILLER stated "Naw, he ain't ready. He gone now, so I dunno." SHEPHARD asked, "Where he go?" MILLER stated that his customer was no longer interested in purchasing the heroin today, but the transaction could occur tomorrow. SHEPHARD responded, "Tomorrow! Man, come on n***a, got me ridin' with this crap (heroin). . . Man, why you ain't call me and let me know, I would never rolled with this s**t (gotten into the car with the heroin)." SHEPHARD asked MILLER to call his customer to see what he wanted to do, but MILLER told SHEPHARD, "Go on and take it back, and I'll get you tomorrow."

56. On or about September 2, 2012, at approximately 9:19 a.m., LUTHER B. JOHNSON called EUGENE MILLER, and asked him to

"Bring . . . a little knife (a substance used to cut or dilute heroin)." MILLER asked, "A little knife?" JOHNSON responded, "Yeah, you know what I'm talking about mother f**ker. What you use a knife for?" MILLER agreed to bring a cutting agent to JOHNSON.

57. On or about September 4, 2012, at approximately 9:37 a.m., FREDERICK L. DARLING had a conversation with K.M., a person known to the Grand Jury but not charged herein. During the conversation, K.M. stated, "I am going to give you your money next week. I pay you the two grand and, like, somebody, they want to for the two grand next week (buy two more ounces of heroin)." DARLING answered, "Alright." K.M. replied, "So I can go ahead and buy, like, the three (ounces of heroin), my kid, they, they have to be coming by the end of this month. I want to buy more (heroin) next week." DARLING replied, "But I need my money." K.M. answered, "That is why I call you for, next week, I am going to bring you your money for you . . . I appreciate you try for me. Thank you so much. I'll bring it for you next week Friday."

58. On or about September 10, 2012, EUGENE MILLER met with an undercover officer. During the meeting, MILLER explained why he was having trouble getting heroin to supply to the undercover officer. MILLER explained, "Alright, I heard through one of my

men. Guys I know (L.E. and L.H.), they just got knocked coming from Chicago with five keys (five kilograms of heroin)." The undercover officer said, "Uh-huh." MILLER continued, "So I know that got something to do with it (why heroin is not available)." The undercover officer said, "Your, your ..." MILLER stated, "People I know off St. Clair (St. Clair Avenue in Cleveland, Ohio)." A little later in the conversation, MILLER explained further, "Yeah, think somebody told on him (L.E. and L.H.). I don't know from what end. They saying from Chicago end." The undercover officer stated, "Chicago, I thought . . . f**king n***as don't know what they be doing man."

59. On or about September 11, 2012, at approximately 4:35 p.m., EUGENE MILLER sold approximately 27.37 grams of heroin to an undercover officer at MILLER's residence on Bryant Avenue in Cleveland, Ohio. Shortly after this transaction, at approximately 4:55 p.m., EUGENE MILLER, BRENDA H. NORMAN, and THOMAS C. MCCULLY met at DARLING's residence on Linwood Avenue, in Cleveland, Ohio.

60. On or about September 13, 2012, at approximately 3:45 p.m., EUGENE MILLER sold approximately 27.98 grams of heroin to an undercover officer at MILLER's residence on Bryant Avenue in Cleveland, Ohio. Shortly after this transaction, at

approximately 4:00 p.m., ERIAN J. HARWELL left MILLER'S residence.

61. On or about September 21, 2012, PIERRE A. CAMPBELL sold .7 grams of heroin to a Confidential Informant in Cleveland, Ohio.

62. On or about September 26, 2012, LEAMON SHEPHARD sold approximately 27.26 grams of heroin to EUGENE MILLER, who then sold the heroin to an undercover officer.

63. On or about October 5, 2012, A.M. picked up approximately 2.1 kilograms of heroin in Joliet, Illinois, in order to transport the heroin to Cleveland, Ohio for distribution.

64. On or about October 5, 2012, LUTHER B. JOHNSON sold approximately .2 grams of heroin to a confidential informant in Cleveland, Ohio.

65. On or about October 5, 2012, KEVIN M. SCOTT sold approximately .2 grams of heroin to a confidential informant in Cleveland, Ohio.

66. On or about October 8, 2012, THOMAS C. MCCULLY sold approximately .1 grams of heroin to a confidential informant in Cleveland, Ohio.

67. On or about October 10, 2012, LUTHER B. JOHNSON sold approximately .1 grams of heroin to a confidential informant in Cleveland, Ohio.

68. On or about October 10, 2012, STEVENSON BLACK sold approximately .24 grams of heroin to a confidential informant in Cleveland, Ohio.

69. On or about October 11, 2012, PIERRE A. CAMPBELL sold approximately .6 grams of heroin to a confidential informant in Cleveland, Ohio.

70. On or about October 17, 2012, LUTHER B. JOHNSON sold approximately .4 grams of heroin to a confidential informant in Cleveland, Ohio.

71. On or about October 17, 2012, STEVENSON BLACK sold approximately .4 grams of heroin to a confidential informant in Cleveland, Ohio.

72. On or October 18, 2012, CARL D. AKINS possessed approximately 87.8 grams of heroin and 117.6 grams of cocaine base (crack) in Beachwood, Ohio.

73. On or about October 22, 2012, THOMAS C. MCCULLY sold approximately 1.1 grams of heroin to a confidential informant in Cleveland, Ohio.

74. On or about October 24, 2012, at approximately 12:27 p.m., S.F., a person known to the Grand Jury but not charged

herein, called LEAMON SHEPHARD on the telephone. During the call, SHEPHARD asked, "What's the deal?" S.F. said, "Nothing. F**kin' trying, trying to grab something (heroin), but the other s**t (heroin) was some bulls**t. It was all f**kin' muddy and f**kin' clogging s**t (the needle) up and everything. Different dude switched it up." SHEPHARD said, "Huh?" S.F. said, "I said dude switched it up." SHEPHARD said, "He did?" S.F. said, "F**k yeah." Later in the call, S.F. said, "Find some decent (heroin) now, I'll f**kin' grab two of 'em (two grams of heroin). Alright." SHEPHARD said, "I gotcha. Just give me a minute. Don't go nowhere." S.F. said, "Alright bro." SHEPHARD said, "Alright."

75. On or about October 25, 2012, ERIAN J. HARWELL sold approximately 27.4 grams of heroin to EUGENE MILLER, who then sold the heroin to an undercover officer.

76. On or about October 25, 2012, DOUGLAS T. JOHNSON sold approximately 0.9 grams of heroin to a confidential informant in Cleveland, Ohio.

77. On or about October 31, 2012, THOMAS C. MCCULLY sold approximately 1.97 grams of heroin to a confidential informant in Cleveland, Ohio.

78. On or about November 1, 2012, at approximately 12:24 p.m., LEAMON SHEPHARD and MARCUS BLUE spoke on the telephone.

During the conversation, SHEPHARD asked, "You gonna take care of me tomorrow?" BLUE said, "Uh, I can like five (a quantity of money), like half of it." SHEPHARD said, "Alright. S**t, that's cool." BLUE said, "That's cool?" SHEPHARD said, "Yeah, that's cool. I can deal with it." BLUE said, "I'm saying, I, I'll meet you, then I can give you the other five later." SHEPHARD replied, "I ain't tripping, that's cool."

79. On or about November 1, 2012, at approximately 6:52 p.m., LEAMON SHEPHARD and MICHAEL L. JONES spoke on the telephone. During the call, JONES said, "Yeah, 'cause I need you ASAP (to buy heroin)." SHEPHARD said, "Alright, I got you." JONES said, "I can meet you at the shop Juice. You know it's a dollar (\$100 per gram of heroin)." SHEPHARD said, "You said, alright, alright, bet!" JONES said, "A dollar! A dollar! A dollar!" SHEPHARD said, "I got you. I got you. Give me like 20 minutes. I'm goin' call you in 20 minutes." JONES said, "Alright."

80. On or about November 3, 2012, at approximately 5:30 p.m., LEAMON SHEPHARD talked with BENEDITTO A. BELFIORE on the telephone. During the call, SHEPHARD said, "I said, you want that plus the 40 (\$40 worth of heroin)?" BELFIORE said, "Yeah." SHEPHARD said, "Alright." BELFIORE said, "Oh no, oh no, no, no. That just, seven, seventy all together (\$70 worth of heroin),

but just make the 40 (\$40 worth of heroin) separate. Make it 40 (\$40 worth of heroin) and 30 (\$30 worth of heroin) I guess."

81. On or about November 3, 2012, at approximately 6:26 p.m., LEAMON SHEPHARD talked to BENEDITTO A. BELFIORE on the telephone. During the call, SHEPHARD asked, "What's happening?" BELFIORE said, "I need a G (gram of heroin)." SHEPHARD said, "Alright."

82. On or about November 5, 2012, at approximately 5:21 p.m., LEAMON SHEPHARD talked to BENEDITTO A. BELFIORE on the telephone. During the call, SHEPHARD said, "Hey, you ain't never check on that one thing we talked about?" BELFIORE said, "Uh, it's coming in like tomorrow or the next day, like eight zips (8 ounces of marijuana)." SHEPHARD said, "Alright." BELFIORE said, "Um, and where you at now, cause, uh, that same dude from the other night called me. He want to cop probably like around the same (amount of heroin)." SHEPHARD said, "We ain't going to talk about that, we ain't gonna do all that on the phone ..."

83. On or about November 6, 2012, at approximately 3:05 p.m., BENEDITTO A. BELFIORE called LEAMON SHEPHARD on the telephone. During the call, BELFIORE said, "Yo, I got a gram of some bud (marijuana). That's back out. Uh, you just want to trade? I needed that gram, then you just, I don't know, for a

twamp (\$20 worth of heroin) or something? Make sure you show your boy." SHEPHARD said, "I'll call you when I'm outside the house. Right now I'll, I'm waiting to come outside."

84. On or about November 7, 2012, DOUGLAS T. JOHNSON sold approximately .44 grams of heroin to a confidential informant in Cleveland, Ohio.

85. On or about November 8, 2012, at approximately 7:14 p.m., LEAMON SHEPHARD called D.S., a person known to the Grand Jury but not charged herein, about a burglary that D.S. and another individual were committing of a suspected drug trafficker in Euclid, Ohio. During the call, SHEPHARD asked, "Can you get in?" D.S. answered, "Nuh, this n***a can't get in the f**king window." SHEPHARD said, "Huh?" D.S. said, "You can't get in the bitch. It's some latches on top of it." SHEPHARD said, "Some who?" D.S. said, "It some latches on top of it."

86. On or about November 9, 2012, at approximately 1:53 p.m., LEAMON SHEPHARD called JACOB O. DERRICKSON on the telephone. During the call, SHEPHARD asked, "Hey, which way to you, which way to you, uh, which way do you take care of your business (use heroin)?" DERRICKSON said, "What do you mean?" SHEPHARD said, "When you come see me (to buy heroin), which way do you take care of your business (use heroin)?" DERRICKSON

said, "Like South Euclid." SHEPHARD said, "Oh my God, man, come on man. You can't really being serious. Listen to what I'm tellin' you." DERRICKSON said, "I don't, I don't understand." SHEPHARD said, "Listen to me. When you come see me, when you come holler at me, after you get what you get from me, how do you do what you do (use heroin)?" DERRICKSON said, "With a rig (injecting heroin)." SHEPHARD said, "Alright. I need you to come holler at me right now. I need you to try something else." DERRICKSON said, "Okay, bet."

87. On or about November 9, 2012, at approximately 2:32 p.m., JACOB O. DERRICKSON called LEAMON SHEPHARD on the telephone. During the call, DERRICKSON said, "Aw, man, that (heroin sample) got me like, a little somethin', but I mean, usually I'll hit a whole 40 (\$40 worth of heroin). So I mean that wasn't much." SHEPHARD said, "Alright." DERRICKSON said, "So, I mean it's, it's decent. It (heroin) ain't bad." SHEPHARD said, "I'm gonna see what's up then. I'm gonna holler at dude (heroin supplier) right now. I'm probably gonna grab some (heroin)."

88. On or about November 13, 2012, DOUGLAS T. JOHNSON sold approximately 1.92 grams of heroin to a confidential informant in Cleveland, Ohio.

89. On or about November 15, 2012, PIERRE A. CAMPBELL sold approximately .8 grams of heroin to a confidential informant in Cleveland, Ohio.

90. On or about November 16, 2012, at approximately 3:35 p.m., LEAMON SHEPHARD called JACOB O. DERRICKSON on the telephone. During the call, SHEPHARD said, "I'm on my way. Where you at?" DERRICKSON said, "I was tryin' to get something (heroin) for this girl. Let me give her a call and see if she still needs it." SHEPHARD said, "Alright." DERRICKSON said, "Alright."

91. On or about November 19, 2012, at approximately 6:50 p.m., JACOB O. DERRICKSON called LEAMON SHEPHARD on the telephone. During the call, SHEPHARD asked, "What you wanted?" DERRICKSON said, "A half (half gram of heroin)." SHEPHARD said, "Alright." DERRICKSON said, "What's that, 75 (\$75), 80 (\$80)?" SHEPHARD said, "Uh, 75 (\$75)." DERRICKSON said, "Alright, cool. I'll see you in a minute." SHEPHARD said, "alright."

92. On or about November 19, 2012, JAMAL H. WILLIAMS sold approximately 4.85 grams of heroin to a confidential informant in Cleveland, Ohio.

93. On or about November 20, 2012, PIERRE A. CAMPBELL sold 3.4 grams of heroin to an Undercover Officer posing as a drug dealer, in Cleveland, Ohio.

94. On or about November 21, 2012, at approximately 2:29 p.m., a confidential informant had a conversation on the telephone with STEVENSON BLACK. During the conversation, the informant said, "You, man, I need that action (heroin). Three, four (three or four grams of heroin), if you got it." BLACK replied, "Huh?" The informant said, "Can you handle it?" BLACK answered, "What's that?" The informant said, "I need that action man. It's (name removed), man." BLACK said, "What you talking about (how much heroin do you want)?" The informant said, "Four (four grams of heroin)." BLACK said, "Yeah, I know what you talking about. How much?" The informant repeated, "Four." BLACK said, "Four hundred (\$400 dollars worth of heroin, approximately four grams)?" The informant said, "Yep." BLACK said, "Uh, I only got three (three grams of heroin)." The informant said, "I'll take the three (three grams of heroin). I'll take that."

95. On or about November 21, 2012, KEVIN M. SCOTT sold approximately .2 grams of heroin to a confidential informant in Cleveland, Ohio.

96. On or about November 23, 2012, PIERRE A. CAMPBELL sold 4.7 grams of heroin to an Undercover Officer posing as a drug dealer, in Cleveland, Ohio.

97. On or about November 23, 2012, STEVENSON BLACK sold approximately 1.06 grams of heroin to a confidential informant in Cleveland, Ohio.

98. On or about November 26, 2012, at approximately 1:31 p.m., EUGENE MILLER called LEAMON SHEPHARD on the telephone. During the call, SHEPHARD asked, "I said, what's up with it (how much heroin do you want)?" Miller said, "Uh, 28 (28 grams or one ounce of heroin)." SHEPHARD said, "Where you at?" Miller said, "I'm at home." SHEPHARD said, "Alright, I'll call you in a minute. About to come out."

99. On or about November 26, 2012, at approximately 5:51 p.m., LEAMON SHEPHARD called EUGENE MILLER on the telephone. During the call, SHEPHARD told MILLER that he didn't forget about MILLER but had gotten tied up. MILLER told SHEPHARD "Okay, well, don't forget about me now. . . Plus, we are going to do the same thing (I'm going to buy the same amount of heroin from you) tomorrow."

100. On or about November 26, 2012, LEAMON SHEPHARD and Corey D. Etheridge sold approximately 26.78 grams of heroin to EUGENE MILLER, who then sold the heroin to an undercover officer.

101. On or about November 27, 2012, PIERRE A. CAMPBELL sold 6.97 grams of heroin to an Undercover Officer posing as a drug dealer, in Cleveland, Ohio.

102. On or about November 27, 2012, at approximately 12:26 p.m., EUGENE MILLER called LEAMON SHEPHARD on the telephone. During the call, SHEPHARD asked MILLER, "What you want me to do (do you need additional heroin today)?" MILLER responded that he was "still waiting for a call back on that (waiting to hear from his customer whether he wanted to purchase additional heroin)."

103. On or about November 30, 2012, at approximately 9:38 p.m., BENEDITTO A. BELFIORE called LEAMON SHEPHARD on the telephone. During the call, BELFIORE said, "Nothing, s**t, um, hey, you around? My, uh, dude wanted to get a half (half gram of heroin)."

104. On or about December 3, 2012, THOMAS C. MCCULLY sold approximately 2.02 grams of heroin to a confidential informant in Cleveland, Ohio.

105. On or about December 4, 2012, JAMAL H. WILLIAMS sold approximately 3.19 grams of heroin to a confidential informant in Cleveland, Ohio.

106. On or about December 5, 2012, PIERRE A. CAMPBELL sold 10.2 grams of heroin to an Undercover Officer posing as a drug dealer, in Cleveland, Ohio.

107. On or about December 5, 2012, ERIAN J. HARWELL possessed 0.26 grams of heroin and 0.03 grams of marijuana in Cleveland, Ohio.

108. On or about December 6, 2012, at approximately 11:36 a.m., MICHAEL L. JONES used LEAMON SHEPHARD's telephone to call GREGORY T. SAVAGE, SR. During the call, SAVAGE asked, "What you up at the shop (the auto shop run by SHEPHARD's father, LEAMON EDDIE) doing?" JONES responded, "Nothing. We just pulled, serving (selling heroin to) one of those white dudes." SAVAGE said, "Oh." JONES replied, "Yeah."

109. On or about December 7, 2012, at approximately 11:50 p.m., F.F., a person known to the Grand Jury but not charged herein, called LEAMON SHEPHARD on the telephone. F.F. called SHEPHARD from the auto shop run by SHEPHARD's father, LEAMON EDDIE. SHEPHARD was not present at the shop, but told F.F. to put MICHAEL L. JONES, who was present, on the telephone. SHEPHARD told JONES, "Alright. Ask him what he want?" JONES said to F.F., "He (SHEPHARD) said, 'what you want?'" F.F. eventually responded, "One of 'em, gram (of heroin)." SHEPHARD instructed JONES, "Alright, go give him one (gram of heroin).

It's in my, uh, it's, go in the back room." Later in the call, after JONES had gone to the back room, SHEPHARD instructed him further, "You in the back room? Go in the Jordan box." JONES said, "The Jordan?" SHEPHARD said, "Go in the box. Go in my box. Man, go in my box." JONES said, "Oh, alright." SHEPHARD said, "Get what you need out. Get the yellow box and then get the thing (heroin), the, uh, the thing (heroin), I, you know, you know." JONES said, "Um-hm." SHEPHARD continued, "Get that (heroin) out and then go to the front, go to the front of the room. Them little bitty (unintelligible)." JONES agreed, "Um-hm." SHEPHARD continued, "Look in there and get it out and get what he need and then get you, like, uh, get you some (heroin). Not too, you know, don't go crazy, n***a." JONES responded, "Alright, alright, alright." SHEPHARD said, "Alright?" JONES asked, "How much you charge him?" SHEPHARD said, "Uh, he know what is. He already got everything together already." JONES said, "Alright." SHEPHARD ordered, "Go get the money first." JONES said, "Alright, okay."

110. On or about December 8, 2012, at approximately 5:19 p.m., DANA M. ERVIN called LEAMON SHEPHARD on the telephone. During the call, ERVIN said, "I can't, can't be like you? Damn! I just need a little money." SHEPHARD replied, "I don't know what you talking about, but." ERVIN said, "Give a dog a bone,

boy (sell me some heroin)." Later in the call, ERVIN said, "You ain't got what we like (heroin), huh?" SHEPHARD said, "Always." ERVIN said, "What we talking about (how much heroin and what price)?" SHEPHARD said, "S**t, I'm about to bump into you in a minute (to sell heroin). Give me like twenty minutes, I'll bump into you."

111. On or about December 11, 2012, KENNETH E. HARRIS sold approximately 3.22 grams of heroin to a confidential informant in Cleveland, Ohio.

112. On or about December 11, 2012, PIERRE A. CAMPBELL sold 10.6 grams of heroin to an Undercover Officer posing as a drug dealer, in Cleveland, Ohio.

113. On or about December 12, 2012, at approximately 4:26 p.m., LEAMON SHEPHARD sent BENEDITTO A. BELFIORE a text message that said, "Tell Jd (JACOB O. DERRICKSON) I got fire (high-quality heroin)."

114. On or about December 12, 2012, at approximately 8:47 p.m., DANA M. ERVIN called LEAMON SHEPHARD on the telephone. During the call, ERVIN asked, "So you got what we like (heroin)?" SHEPHARD answered, "Mm, yeah, I'm cool (have heroin)." ERVIN said, "Huh?" SHEPHARD said, "I said, yeah, I'm cool." ERVIN said, "What's the prices?" SHEPHARD said, "I don't know what you're talking about on that, truth." ERVIN said,

"Huh?" SHEPHARD said, "I said, I don't know what you're talking about." ERVIN said, "So you don't have what we got (heroin)?" SHEPHARD said, "(Unintelligible) Yeah, you have to talk to me in person 'cause I don't know what you're talking about (we can't discuss selling heroin over the telephone, but only in person)."

115. On or about December 13, 2012, at approximately 9:33 p.m., JACOB O. DERRICKSON sent LEAMON SHEPHARD a text message that said, "When ditto (BENEDITTO A. BELFIORE) come n see u give him a ten (\$10 worth of heroin) and a thirty (\$30 worth of heroin) its my 40 (\$40) buffeted he's picking me up so Ima give home something ok?"

116. On or about December 14, 2012, at approximately 3:14 p.m., BENEDITTO A. BELFIORE called LEAMON SHEPHARD on the telephone. MICHAEL L. JONES answered SHEPHARD's phone and told BELFIORE, "This, this, this ain't Juice (SHEPHARD). You wanna holler at Juice (SHEPHARD)?" BELFIORE said, "Yeah." JONES said, "Hey, uh, what you at the shop?" BELFIORE said, "No, I was, I was, I was looking for him (to buy heroin). Where he at?" JONES said, "You comin' our way?" BELFIORE said, "Yeah." JONES said, "Alright, well how long you be? Because we headed back there too." BELFIORE said, "Uh, 'bout 20, 20 minutes." JONES said, "Okay, I'll tell him. We'll be there in 20." At approximately 3:44 p.m., BELFIORE called LEAMON SHEPHARD and

told him, "No, I'm about to be down there." SHEPHARD said, "Alright, I'm on my way." BELFIORE said, "Dude (JONES) said you were there." SHEPHARD said, "I'm on my way, man. I'll be there in a couple minutes." At approximately 4:00 p.m., BELFIORE called SHEPHARD again and asked, "How much longer 'till you be here?" SHEPHARD said, "What you tryin' to do?" BELFIORE said, "Forty (\$40 worth of heroin)." SHEPHARD said, "Alright, I be there in five minutes."

117. On or about December 18, 2012, FREDERICK L. DARLING sold approximately 2.97 grams of heroin to a confidential informant in Cleveland, Ohio.

118. On or about December 19, 2012, starting at approximately 5:46 p.m., LEAMON SHEPHARD and JACOB O. DERRICKSON exchanged a series of text messages discussing a recent heroin overdose by BENEDITTO A. BELFIORE. After SHEPHARD sent a text message to DERRICKSON asking what was up, DERRICKSON sent SHEPHARD a message that said, "I slowed alottt if you couldn't tell after that S**t went down with dummyditto (BELFIORE)." SHEPHARD texted back, "Wat went down." DERRICKSON responded, "U don't remember...he told u...he almost overdose." SHEPHARD replied, "Oh yea." DERRICKSON explained further, "Well he did overdose. I saved that n***as life gave him cpr." SHEPHARD replied, "That's crazy." DERRICKSON wrote, "And i shot him up with a

suboxone." SHEPHARD again wrote, "That's crazy." DERRICKSON said, "He had no pulse his face paper white lips blue S**t was f**ked up." SHEPHARD again, "That's crazy." DERRICKSON replied, "Insane." SHEPHARD wrote, "I kno." DERRICKSON then wrote, "Wears thing is i shot (injected) more tha. 2x what did (of heroin) and barely got a rush," and continued, "At the same time." SHEPHARD responded, "He better chill." DERRICKSON wrote, "He don't know how. and he's broke he got no hustle game skills (drug trafficking ability)." SHEPHARD responded, "That's all bad." DERRICKSON then wrote, "LoL," and explained further, "S**t between work and my herb (marijuana) hustle (trafficking) i can make 2500\$ a wk he don't make that in 2 mmonths." SHEPHARD responded, "He a be ok."

119. On or about December 19, 2012, JAMAL H. WILLIAMS sold approximately 2.98 grams of heroin to a confidential informant in Cleveland, Ohio.

120. On or about December 20, 2012, KENNETH E. HARRIS sold approximately 3.43 grams of heroin to a confidential informant in Cleveland, Ohio.

121. On or about December 26, 2012, PIERRE A. CAMPBELL sold 27.8 grams of heroin to an Undercover Officer posing as a drug dealer, in Cleveland, Ohio.

122. On or about December 28, 2012, at approximately 10:33 a.m., MICHAEL BUCHANAN received a telephone call from THOMAS C. MCCULLY. During the conversation, BUCHANAN asked MCCULLY to "call...and let me know what's happening (whether you have any heroin for sale)."

123. On or about December 28, 2012, at approximately 11:23 a.m., MICHAEL BUCHANAN received a telephone call from THOMAS C. MCCULLY, and they arranged a place to meet.

124. On or about December 28, 2012, at approximately 7:37 p.m., FREDERICK FERRELL called THOMAS C. MCCULLY. FERRELL stated, "You know I put some of that (heroin) in my mouth a couple of times for the last 3-4 months, right? . . . The last couple of batches over there, you know? The ibuprofen . . . That was burning your nose (when snorted). Remember I told you it burns your nose?" MCCULLY responded, "What you talking, from Big Dog (are you talking about the heroin you got from FREDERICK L. DARLING)?" FERRELL responded, "Think about it . . . it (the heroin) burn your nose and I don't like that s**t." Later, MCCULLY asked, "Did you ever catch up with whatchamacallit?" FERRELL answered, "Who? Yeah, he was knocked out." MCCULLY stated, "Yeah, well he need to be knocked out 'cause he ain't, he ain't hollering too loud right now (he is not conducting many heroin transactions recently), no way." FERRELL responded,

"It's okay." MCCULLY asked, "I mean, yeah, okay, but s**t, ain't you tired of 'okay' (aren't you tired of mediocre heroin)?"

125. On or about December 29, 2012, at approximately 8:40 p.m., MICHAEL BUCHANAN received a telephone call from THOMAS C. MCCULLY. During the call, MCCULLY asked BUCHANAN, "Where you at around now?" BUCHANAN responded, "Uh, s**t. I'm rolling. Where you at, s**t? Where you trying to be?" MCCULLY stated, "I'm trying to be next to you (trying to find BUCHANAN to obtain heroin.)" BUCHANAN instructed MCCULLY to meet him at BUCHANAN's cousin's house.

126. On or about December 30, 2012, at approximately 5:40 p.m., THOMAS C. MCCULLY called FREDERICK L. DARLING. During the conversation, MCCULLY told DARLING that he "went and saw Israel (MICHAEL BUCHANAN) yesterday." MCCULLY also said, "he's got a...I saw the, the new movie, right (tried a new supply of heroin)." DARLING asked, "Yeah, you didn't like it? (it's poor quality?)" MCCULLY responded, "Oh s**t. It's a mother f***er....that's why I just got up (it was good quality)." DARLING asked if MCCULLY had saved any, but MCCULLY said he did not.

127. On or about December 31, 2012, at approximately 11:51 a.m., THOMAS C. MCCULLY spoke to J.S., a person known to the

Grand Jury but not charged herein, on the telephone. During the call, J.S., "What's, uh, Is' (MICHAEL BUCHANAN, aka Israel) looking like (does he have heroin)?" MCCULLY told J.S., "Looking good (there was heroin)." J.S. asked, "Better than the rest of the people (better quality than others)?" MCCULLY said, "To me, yeah."

128. On or about December 31, 2012, at approximately 1:25 p.m., MICHAEL BUCHANAN received a telephone call from THOMAS C. MCCULLY. During the conversation, BUCHANAN asked, "You got it (were you able to obtain the heroin)? You got it? What up with you?" MCCULLY asked BUCHANAN, "Where's the closest safe place for me to meet you at (to conduct a heroin transaction)?," and they arranged a place to meet.

129. On or about January 3, 2013, THOMAS C. MCCULLY sold approximately 2.05 grams of heroin to a confidential informant in Cleveland, Ohio.

130. On or about January 3, 2013, LEAMON SHEPHARD and MARCUS BLUE distributed approximately 24.19 grams of counterfeit heroin to EUGENE MILLER, who then distributed the counterfeit heroin to an undercover officer.

131. On or about January 3, 2013, DANA M. ERVIN possessed approximately 8 grams of heroin, approximately 17 grams of

cocaine, approximately 102 grams of marijuana, \$2,915 in cash, and a firearm in a vehicle.

132. On or about January 4, 2013, DANA M. ERVIN possessed approximately 23 grams of heroin, approximately 78 grams of cocaine, approximately 1,366 grams of marijuana, scales, three firearms, and \$15,080 in cash at his residence.

133. On or about January 4, 2013, at approximately 11:44 a.m., MICHAEL BUCHANAN received a telephone call from THOMAS C. MCCULLY. During the conversation, BUCHANAN asked, "You got it (were you able to obtain the heroin)? What's happening with you?" MCCULLY and BUCHANAN then arranged a place to meet.

134. On or about January 4, 2013, at approximately 12:24 p.m., MICHAEL BUCHANAN called THOMAS C. MCCULLY. BUCHANAN asked why MCCULLY had left the meeting location. MCCULLY stated, "Police was playin' around (patrolling the neighborhood) and some white boys drove by, look like police." They then arranged a different place to meet.

135. On or about January 5, 2013, at approximately 1:37 p.m., MICHAEL BUCHANAN received a telephone call from THOMAS C. MCCULLY. During the conversation, MCCULLY asked, "Where we at now (do you have heroin)?" BUCHANAN replied, "It's where we want to be (yes I have heroin)." MCCULLY asked BUCHANAN to meet him at MCCULLY's residence.

136. On or about January 5, 2013, at approximately 4:53 p.m., THOMAS C. MCCULLY spoke with FREDERICK FERRELL on the telephone. During the conversation, MCCULLY stated that it was time for him to "have a little something (money) in my pocket." They discussed one of MCCULLY's heroin customers who was dissatisfied. FERRELL asked if, "he pissed off because he got to pay?" MCCULLY responded, "No, because a two and a half became three (the heroin was cut)." FERRELL asked if MCCULLY cut the heroin himself, and MCCULLY responded that he did. FERRELL asked, "What you do, half-ass do it (cut the heroin poorly)?" MCCULLY responded, "Um-hmm, yeah, yeah, kinda." FERRELL responded, "I thought you were slicker than that." MCCULLY stated, "I ain't had time (to cut the heroin properly). I was out in the car, you know? I had to go ahead and do what I did. I was out in the car." FERRELL then said, "All you had to do was have the right color, n***a . . . Put some dirt in it. Goddamn. All that s**t . . . All you had to do was be a little brown, that's all." Later in the conversation, MCCULLY stated, "I know how to play this game. He will be back this way."

137. On or about January 7, 2013, FREDERICK L. DARLING sold approximately 5.33 grams of heroin to a confidential informant in Cleveland, Ohio.

138. On or about January 8, 2013, at approximately 9:12 p.m., FREDERICK FERRELL called THOMAS C. MCCULLY and they discussed cutting heroin. FERRELL stated, "You know what we was talkin' about earlier, before I left, right? . . . I got that (heroin) off from what's his name in there." MCCULLY responded, "Yeah, I know who you talkin' about." FERRELL stated, "I put three of that (cut) . . . What's the name in it? . . . I just knew they (the heroin customers) was call me bitchin' (complaining about the quality of the heroin) (laughs). You hear me? . . . Them ex, experts, you know?" MCCULLY responded, "Right." FERRELL stated, "Comin' back for more." Later in the conversation, FERRELL stated, "What I'm tryin' to tell you is we could take one (quantity of heroin) and, uh, . . . take a little of that old soma, soma (cut). It don't take much of that." MCCULLY stated, "It don't take nothing but some money for us to get started on it. You gotta have some ends." Later in the conversation, FERRELL stated, "You know it takes less than, a, a, a, about a half a tenth of that s**t (heroin) mixed in with a whole, big ole half, half a key (half a kilogram of cut), man." MCCULLY responded, "Hmm-mm." FERRELL continued, "You done turn into a monster." MCCULLY said, "I believe you." FERRELL then stated, "I took a little bit . . . I tried to you know, take a little bit of that s**t and you know, mix it in . .

. and I woke up knocked the f**k out. What the f**k was that?" MCCULLY answered, "I believe you." FERRELL continued, "Tough thing is, it don't take much of any of that s**t. You know what I'm sayin'? To mix with that. You get a chemical reaction there like, goddamn, you know? 'Cuz look, if I take one (kilogram of cut), right? . . . And I take that and a, and a, and a damn key (kilogram of heroin). . . and make two out of it with the cut. Now, I blew up- let's say a half key (kilogram) of it and uh, for ours, right? . . . And this knocking me the f**k out. Even though I only had that much of the three in me. See what I'm sayin'? . . . Three fourth of the mother f**ker is . . . of that bitch is still in there." MCCULLY responded, "Well. Allright . . . still, there - we gonna get together." Later in the conversation, MCCULLY stated, "As long as they ain't . . . as long as they not goin' through the needle (injecting the heroin), it can still work."

139. On or about January 15, 2013, at approximately 1:33 p.m., a confidential informant had a conversation with KEVIN M. SCOTT on the telephone. During the conversation, the informant asked, "Hey, hey, what's up Drew? What's going on, man (do you have any heroin)?" SCOTT answered, "You!" The informant said, "You ain't even called me, man." SCOTT said, "Come on, come on, quit playing on the phone. Come on. I got it (heroin) now,

come on." The informant said, "You got it (heroin) now?" SCOTT answered, "I got it (heroin) now!" The informant replied, "I'm on the way then (to buy heroin). I'm on the way. Keep that damn heat (high-quality heroin) for me."

140. On or about January 15, 2013, KEVIN M. SCOTT sold approximately .4 grams of heroin to a confidential informant in Cleveland, Ohio.

141. On or about January 18, 2013, JAMAL H. WILLIAMS and ANDREW E. LOVING sold approximately 4.29 grams of heroin to a confidential informant in Cleveland, Ohio.

142. On or about January 21, 2013, at approximately 7:07 p.m, THOMAS C. MCCULLY spoke with FREDERICK FERRELL. During the conversation, FERRELL stated, "I f**ked around and went to Detroit with Israel (MICHAEL BUCHANAN)." MCCULLY asked, "How's things look, look like up? Good (is there a supply of heroin available)?" FERRELL responded, "There were when I was yesterday." MCCULLY responded, "I'm talkin' about . . . with, with your buddy. With Israel (BUCHANAN)." FERRELL responded, "They were yesterday (as of yesterday, BUCHANAN had a supply of heroin)."

143. On or about January 21, 2013, at approximately 7:34 p.m., MICHAEL BUCHANAN received a telephone call from THOMAS C. MCCULLY. During the conversation, MCCULLY asked BUCHANAN to

call "Little Fred" (FREDERICK FERRELL) and gave him (MCCULLY) "Little Fred's" telephone number.

144. On or about January 21, 2013, at approximately 9:35 p.m., MICHAEL BUCHANAN received a telephone call from THOMAS C. MCCULLY. During the conversation, BUCHANAN asked MCCULLY, "Hey, you got it (heroin), n***a? What's happening with you?" MCCULLY responded that, "I'm supposed to try and make an appointment (to obtain heroin) at about 10 o'clock in the morning." They agreed to talk the next morning.

145. On or about January 22, 2013, at approximately 1:15 p.m., THOMAS C. MCCULLY spoke with an unknown individual. During the conversation, the unknown individual told MCCULLY, "I need two of them (two ounces of heroin)." MCCULLY replied, "Ha, you gonna need a deuce (two ounces of heroin)." The unknown individual said, "Yep. I'll need that thing. It's got to be right. ..."

146. On or about January 22, 2013, at approximately 4:02 p.m., MICHAEL BUCHANAN spoke to THOMAS C. MCCULLY on the telephone. During the call, MCCULLY asked if BUCHANAN was, "handling your handle (still had heroin)?" BUCHANAN responded that, "Everything pretty good on my side, you know. So far (he currently has heroin)." MCCULLY stated, "I'm sure going to be hollering at you (obtaining heroin) first thing in the morning,"

and then said, "I need to see you now." They then arranged to meet later in the afternoon.

147. On or about January 22, 2013, at approximately 4:54 p.m., THOMAS C. MCCULLY called the unknown individual back and asked, "Two or one (two ounces or one ounce of heroin)?" After the unknown individual did not answer right away, MCCULLY asked again, "You didn't say, two or one (two ounces or one ounce of heroin)?" The unknown individual answered, "Yeah, uh, just the one (ounce of heroin)." MCCULLY said, "Okay."

148. On or about January 22, 2013, JAMAL H. WILLIAMS and ANDREW E. LOVING sold approximately 4.72 grams of heroin to a confidential informant in Cleveland, Ohio.

149. On or about January 28, 2013, TERRANCE FLETCHER sold approximately 3.5 grams of heroin to a confidential informant in Cleveland, Ohio.

150. On or about January 29, 2013, at approximately 1:44 p.m., PIERRE A. CAMPBELL called DAVID E. MCCALL, JR. on the telephone. During the conversation, MCCALL asked, "... What you about to get into?" CAMPBELL replied, "I'm just going to hit one of my licks (sell heroin) real quick." Later in the conversation, CAMPBELL asked, "Hey, you got some raw (do you have uncut heroin for sale)?" MCCALL replied, "No, I got some

(heroin) from my fat n**ga. I did a little something to it (I already added cut to the heroin). . ."

151. On or about January 29, 2013, at approximately 2:43 p.m., VINCENT MORGAN sent PIERRE A. CAMPBELL a text message that read, "What good(?)" At approximately 2:44 p.m., CAMPBELL sent a reply text which read, "Fire (heroin.)" At approximately 2:46 p.m., MORGAN sent a text asking, "You gonna let me test (will you let me try the heroin before I buy it)? I got a hundred on it but I can get fire right now from my one dude (I have \$100 to spend on heroin, but I'm already buying high-quality heroin from another supplier.)" At approximately 2:47 p.m., CAMPBELL sent a text which read "K (okay.)" At approximately 2:55 p.m., MORGAN sent another text which read, "So if I cone through you'll let Me get a piece to try before I spend this bill (if I come to buy heroin from you, you'll let me try some before I buy \$100 worth?)" At approximately 3:01 p.m., CAMPBELL sent a reply which read, "Yep (yes.)"

152. On or about January 29, 2013, at approximately 6:12 p.m., VINCENT MORGAN called PIERRE A. CAMPBELL on the telephone. During the conversation, MORGAN stated, "S**t, I'm about to hop on the highway right now. Where should I meet you at?" CAMPBELL responded, "What you got (how much heroin do you want to buy)?" Morgan replied, "I mean, I may have a hundred (I may

want to buy \$100 worth of heroin), but you said I can try it first." CAMPBELL responded, "Right, right. . ."

153. On or about January 29, 2013, at approximately 7:17 p.m., VINCENT MORGAN sent PIERRE A. CAMPBELL a series of text messages that read, "I'm going to be straight up with you (the heroin you sold me) is pretty good no but I can get s**t that's way better. But if you got me for 100 g (if you'll sell the heroin to me for \$100 per gram) I'll come and get at least 2 (grams of heroin) a day possibly even a baller (3.5 grams of heroin) but for real other than that I got s**t on deck on my end (if you won't sell the heroin to me for \$100 per gram, I have another source of supply.)" At approximately 7:19 p.m., CAMPBELL sent a reply text which read, "Of course(.)" At approximately 7:21 p.m., MORGAN sent a text message which read, "And by the way it was 1.14 (grams of heroin) ha but its all good. But you got me for a bill all day (you'll continue to sell heroin to me for \$100 a gram)?" At approximately 10:14 p.m., CAMPBELL sent a text message which read, "Ok(.)" At approximately 10:15 p.m., MORGAN sent a text message which read, "wait but you got me for the bill (you'll continue to sell me heroin for \$100 per gram)?" At approximately 10:16 p.m., CAMPBELL sent a response text message which read, "All day long(.)" At approximately 10:19 p.m., MORGAN sent a text

message which read, "okay we're going to be doing a lot of business(.)" At approximately 10:19 p.m., CAMPBELL sent a text message which read, "Ok(.)" At approximately 10:19 p.m., MORGAN sent a text message which read, "but it's gotta be the same s**t I don't want it if it gets stomped on (cut or diluted.)" At approximately 10:20 p.m., CAMPBELL sent a response text message that read, "I got u (I understand.)" At approximately 10:23 p.m., MORGAN sent a text message that read, "You gonna be 24/7 or can you not do it sometimes (will you be able to supply me heroin 24 hours a day, 7 days a week, or will there be times that you can't?)" At approximately 10:46 p.m., CAMPBELL sent a text message that read, "All day(.)"

154. On or about January 29, 2013, PIERRE A. CAMPBELL sold 28.1 grams of heroin to an Undercover Officer posing as a drug dealer, in Cleveland, Ohio.

155. On or about January 30, 2013, at approximately 12:02 p.m., VINCENT MORGAN called PIERRE A. CAMPBELL on the telephone. During the conversation, CAMPBELL stated, "Man, I lost in that mother f**ker (lost money in the casino). I need some money. You got some money for me?" MORGAN replied, "I got a little bit, man, would you show me some love?" CAMPBELL replied, "How much you got?" MORGAN stated, "I mean - it's - it's going to be thirty or sixty (\$30 or \$60 worth of heroin)." CAMPBELL asked,

"For what (how much heroin are you expecting to get)?" MORGAN responded, "What's that?" CAMPBELL replied, "I thought you said you was, ah ..." MORGAN stated, "No, a dude - I'm about to - I'm about to get this lick together here (sell heroin to a customer) in a little bit and at least grab one or two of those (grams of heroin) off you later, man, but I have to wait for this dude to get off work (to sell him heroin)." CAMPBELL asked, "Where you at now?" MORGAN stated, "I'm like- I'm right here on the west side." CAMPBELL replied, "Alright, come to the hood, man, come on."

156. On or about January 31, 2013, at approximately 10:11 a.m., ANTWONE NOWDEN sent PIERRE A. CAMPBELL a text message that read, "U got sum more of dat s**t (heroin) u gave me(?)" At approximately 10:12 a.m., CAMPBELL replied, "Yep (yes.)" At approximately 10:15 a.m., NOWDEN sent a text which read, "OK I'm gettin dressed I need 4 (quantity of heroin.)" At approximately 10:16 a.m., CAMPBELL replied, "K (okay.)" At approximately 10:41 a.m., NOWDEN sent a text which read, "I'm ready mom crib (I'm at 'mom's house' and am ready to conduct the heroin transaction.)" At approximately 10:42 a.m., CAMPBELL replied, "'Bout twenty min went to go hit my dude (I'll be there in about 20 minutes, I had to obtain more heroin from my supplier.)" At approximately 10:46 a.m., NOWDEN replied, "K (okay.)"

157. On January 31, 2013, at approximately 8:31 p.m., DAVID E. MCCALL, JR. called PIERRE A. CAMPBELL on the telephone. During the conversation, MCCALL stated, "Hey look, my dude (heroin supplier) just called me back again . . . make sure you goin' hook up (meet to buy heroin) with Dave tomorrow . . . Dave got some (heroin) what I gave him last time for the seventy (\$70 a gram)." CAMPBELL replied, "Right." MCCALL stated, "You don't want to get the whole thing (don't buy all the heroin Dave has for sale). So if he (Dave) get the whole thing (offers the whole quantity for sale), you tell him a yard (you only want to buy 10 grams of heroin) so that's going to be seven hundred dollars (\$700), and we'll just split that, you know?" CAMPBELL replied, "Right." MCCALL stated, "So that's three fifty (\$350.00) a piece. But you goin' (to) have to put everything down though (pay all the money), but you goin' have the phone (MCCALL's cell phone), but I told him, he just text me and said 'who do I ask for?' I'm like 'ask for my n**ga "P (PIERRE A. CAMPBELL)." Like, I've been texting him forever cause he don't like talking on the phone. . . ." CAMPBELL replied, "Right." MCCALL stated, "So it's the same thing as last time, but I'm just giving you a heads up so you'll know his name. 'Terry,' you know what I'm saying? When he call, his name going pop

(appear on McCall's cell phone) so you'll know what's up."

CAMPBELL replied, "Alright."

158. On or about January 31, 2013, TERRANCE FLETCHER sold approximately 5.6 grams of heroin to a confidential informant in Cleveland, Ohio.

159. On or about February 1, 2013, at approximately 10:17 a.m., GREGORY HAMILTON sent PIERRE A. CAMPBELL a text message that read, "I c u maken that winter snow money (I see you're making money selling heroin)." CAMPBELL replied by text message to HAMILTON at approximately 10:31 a.m., "S**t slow (heroin sales are slow)."

160. On or about February 1, 2013, at approximately 3:18 p.m., PIERRE A. CAMPBELL called DAVID D. HARSLEY on the telephone. During the conversation, HARSLEY stated, "Hey, P (CAMPBELL), I had needed you (to supply me with heroin) but now it's late (I already obtained heroin from another supplier)." CAMPBELL asked, "You say what?" HARSLEY replied, "I said, I had, I had, I ha- I had need you for something but it's over with." CAMPBELL replied, "Oh, Okay. Okay. My bad." HARSLEY stated, "Alright, dawg. Alright. I got you, though (I'll still conduct heroin transactions with you in the future)." CAMPBELL replied, "Alright."

161. On or about February 1, 2013, at approximately 6:45 p.m., ANTWONE NOWDEN sent PIERRE A. CAMPBELL a text message that read, "U got sum more of that raw (do you have more of the uncut heroin?)" At approximately 6:48 p.m., CAMPBELL responded, "U know it (yes.)" At approximately 6:49 p.m., NOWDEN replied, "5 (quantity of heroin) bitcccc(.)" At approximately 6:49 p.m., CAMPBELL replied, "Were at (where do you want to meet to complete the transaction?)" At approximately 6:50 p.m., NOWDEN replied "Moms(.)"

162. On or about February 2, 2013, at approximately 10:14 a.m., ANTWONE NOWDEN sent PIERRE A. CAMPBELL a text message that read, "5 (quantity of heroin) bitcccccc(.)" At approximately 10:18 a.m., CAMPBELL responded, "Moms n twenty (we'll conduct the transaction at mom's in 20 minutes.)" At approximately 10:24 a.m., NOWDEN replied, "Ok(.)"

163. On or about February 2, 2013, at approximately 10:47 a.m., PIERRE A. CAMPBELL called DAVID D. HARSLEY on the telephone. During the conversation, CAMPBELL stated, "Alright, look. Check this out. I got- I got a move (heroin sale) on Grovewood. They want 20 (grams of heroin). Give 'em the, uh, remix (heroin that has been cut). Give 'em the remix and give me the difference (profit)." HARSLEY responded, "S**t. Um, alright." Later in the conversation, CAMPBELL stated, "I'm

sayin' ain't tryin' to wait, though. I'd have to come meet you, grab it (the heroin) and go to him (to sell the heroin) and all that s**t." HARSLEY replied, "S**t. Alright, I'll try. I gotta - I'm up here at Shaw Dairy. F**kin' with this n***a Nick's slow ass, to try to get some - you know what I'm sayin'? The other thing (uncut heroin). CAMPBELL replied, "I know, I know, but s**t. You got the remix (cut heroin), though, right?" HARSLEY replied, "Yeah, I got some on me. I - I think I got - hope I got twenty (grams of heroin). You on your way?" CAMPBELL replied, "Huh?" HARSLEY repeated, "You on your way?" CAMPBELL replied, "I know, I'm sayin'; he's sittin' there right now (waiting on the heroin). You go hit him (sell him the heroin), man. Just get, keep the difference (profits) for me. I'll come get it from you when I come down there."

164. On or about February 2, 2013, at approximately 4:08 p.m., PIERRE A. CAMPBELL called DAVID D. HARSLEY on the telephone. During the conversation, CAMPBELL stated, "S**t, um, come on, uh, on Lakeshore real quick." HARSLEY asked, "What's you wanted? The red (heroin)?" CAMPBELL replied, "Uh, yep." HARSLEY stated, "Alright, uh, s**t, alright, uh - I'll call you." CAMPBELL replied, "Alright."

165. On or about February 2, 2013, at approximately 6:33 p.m., ANTWONE NOWDEN sent PIERRE A. CAMPBELL a text message that

read, "Get box of sndwhch bags 2 (pick up a box of sandwich bags, too, to repackage the heroin for sale)." At approximately 7:09 p.m., CAMPBELL replied, "K (okay.)"

166. On or about February 2, 2013, at approximately 11:52 p.m., LEAMON SHEPHARD called MAURICE GOLSTON on the telephone. During the call, SHEPHARD told GOLSTON, "Alright, be, uh, you go down there, watch, uh, look at the gas station. There's a silver Impala. Two big white dudes sittin' in that bitch." GOLSTON said, "Swear?" SHEPHARD said, "Hell yeah. Just sittin' right there at the end of, uh, at the end, uh, at the end of the gas station, uh, lot." In the background of the call, a voice said, "Tell them n***ers don't make no move (drug transaction). Tell them n***ers to lock that bitch up." Later in the call, GOLSTON asked, "What they doin'?" SHEPHARD replied, "I don't know. They just sittin' there watchin' that bitch." GOLSTON said, "Watchin' what?" SHEPHARD explained, "The buildin'. They sittin' right there so they can watch anything that go in or out of it." Later, GOLSTON asked, "You gonna tell them n***ers?" SHEPHARD said, "Huh?" GOLSTON repeated, "Y'all call and tell them n***ers?" SHEPHARD said, "Yeah." GOLSTON asked, "Where y'all about to go?" SHEPHARD answered, "S**t, I'm about to the shop right quick." GOLSTON asked, "What, the new one?" SHEPHARD said, "No, the old one. Meet my people real quick."

167. On or about February 3, 2013, at approximately 6:21 a.m., PIERRE A. CAMPBELL sent GREGORY HAMILTON a text message that read, "I need 3.5 (quantity of heroin) wake up."

168. On or about February 4, 2013, at approximately 5:29 p.m. LEAMON SHEPHARD called DOMINIQUE E. IVORY on the telephone. During the call, IVORY asked SHEPHARD, "What's up? Hey, you ever come? You ever find some (heroin)?" SHEPHARD said, "Huh?" IVORY repeated, "You ever find some (heroin)?" SHEPHARD said, "Hell naw, man. I'm out here riding right now, man." IVORY said, "Damn, man, I need some (heroin), damn." SHEPHARD said, "You dry (out of heroin)?" IVORY said, "You run across something, hell yeah, man. I got a, a big move (heroin deal)." SHEPHARD said, "Alright, I'm a see what, what I can do for you, baby." IVORY said, "Alright, if you could, two f**king bags (two ounces of heroin)." SHEPHARD said, "I got you."

169. On or about February 4, 2013, at approximately 6:18 p.m., MARCUS BLUE called LEAMON SHEPHARD on the telephone. After BLUE complained that his heroin supplier was out of town during the call, SHEPHARD asked, "Man, what the f**k, f**k, so what you gone do?" BLUE answered, "Looking for somebody to burn (supply fake heroin to as a way to steal their money), baby." SHEPHARD said, "Huh?" BLUE said, "Looking for somebody,

somebody, looking for somebody to fly." SHEPHARD said, "S**t, I got somebody, the old school n***a."

170. On or about February 4, 2013, at approximately 6:24 p.m., LEAMON SHEPHARD called MARCUS BLUE on the telephone. During the call, SHEPHARD and BLUE discussed their plan to sell fake heroin to a customer as a way to steal the customer's money. SHEPHARD said, "Oh, okay, I got one (package of fake heroin)." BLUE said, "Um, s**t, how is it?" SHEPHARD said, "S**t, how is it?" BLUE said, "Like the same way we did the one old school dude (a reference to selling counterfeit heroin to Eugene Miller as described in overt act 130)?" SHEPHARD said, "Yeah, I got to, uh, I 'bout to call. I got to get it. I got to grab him." BLUE said, "Is it the same one? But he, he, he, he know this one right here knows. He knows his s**t (can tell fake heroin from real heroin). So you gone have to come a little better than that (make the fake heroin look more realistic)."

171. On or about February 5, 2013, PIERRE A. CAMPBELL was stopped for a traffic violation while driving a vehicle in Cleveland, Ohio. Because CAMPBELL did not have a valid driver's license, CAMPBELL and his passenger were removed from the vehicle. The passenger was found to be in possession of \$3,135.00 in U.S. currency. CAMPBELL was transported to the

Cleveland Police Central Processing Unit, where it was determined that CAMPBELL had hidden an object in his buttocks. When the corrections officer noted that he could see the end of a baggie protruding from between CAMPBELL's buttocks, CAMPBELL pushed off of the wall into the corrections officer, pushing the corrections officer backwards. CAMPBELL then pulled the baggie from between his buttocks. As corrections officers attempted to stop him, CAMPBELL dove into a nearby cell, threw the baggie into the toilet, and flushed the baggie down the toilet. Before CAMPBELL flushed the baggie, officers were able to observe that it was a clear plastic bag containing a golf ball size quantity of individual chunks of an off-white substance.

172. On or about February 5, 2013, at approximately 6:10 p.m., DOMINIQUE A. BLAIR called LEAMON SHEPHARD on the telephone. During the call, BLAIR complained to SHEPHARD that some of the heroin she had received from him had been stolen. BLAIR said, "Man, Juice, man, when you see what I got man, you gonna be like, what the f**k is that." SHEPHARD said, "It little?" BLAIR said, "Man, I'll have to put it on the scale, but I know what I had, though, like, you know what I'm saying? I just watched you cut it (dilute the heroin), though. You broke it in half for me. First you broke it in half and then you cut (diluted the heroin)."

173. On or about February 5, 2013, at approximately 8:28 p.m., LEAMON SHEPHARD called DOMINIQUE A. BLAIR on the telephone. During the call, SHEPHARD said, "I got a couple people (heroin customers) that are about to come down. But I can't get to mine (heroin). You want to just take care of them for me (serve them heroin)?" BLAIR said, "I ain't got nothing." SHEPHARD said, "I'll go with you." BLAIR said, "But I ain't got nothing." SHEPHARD said, "Where your, uh, where your one thing (package of heroin) at?" BLAIR said, "I, I sold it. Like regular like, I sold the, uh, I gave it (unintelligible). But I didn't sell him, I just gave him the biggie. I did what he told me to do with that. Because I said I was scared of it." SHEPHARD said, "Alright."

174. On or about February 6, 2013, DAVID D. HARSLEY possessed 47.43 grams of heroin and a digital scale with heroin residue in Cleveland, Ohio.

175. On or about February 6 2013, TERRANCE FLETCHER distributed 10.2 grams of heroin to a confidential informant in Cleveland, Ohio.

176. On or about February 7, 2013, at approximately 10:58 a.m., DOMINIQUE A. BLAIR sent LEAMON SHEPHARD a text message that said, "Got a nice sale (of heroin) for u he needs it n cnt find it he has no numbers to," followed by a second text message

continuing the sentence, "contact no one he needs like 4 (grams of heroin) was wondering wat u could to to help!" At approximately 1:47 p.m., SHEPHARD sent a text message back to BLAIR that said, "Call me." Within seconds, BLAIR called SHEPHARD on the telephone. During the call, SHEPHARD asked, "Wussup?" BLAIR said, "Nothin'. He wanna buy like 7 (grams of heroin) for real, but I feel like he should buy like 4 (grams of heroin), and see what this (unintelligible) like (unintelligible), before he be buying so much, that you know."

177. On or about February 7, 2013, at approximately 7:53 p.m., LEAMON SHEPHARD sent DOMINIQUE E. IVORY a text message asking him about the quality of the heroin that SHEPHARD had previously provided that said, "I called u wat yo ppl say." At approximately 8:11 p.m., IVORY responded to SHEPHARD with a text message that said, "Thy didn't like it." At approximately 8:14 p.m., SHEPHARD responded to IVORY with a text message that said, "F**k ok then."

178. On or about February 8, 2013, at approximately 8:20 p.m., ANTWON EVANS called LEAMON SHEPHARD on the telephone. During the call, EVANS said, "Yeah, he called me. S**t, I'm fresh out (of heroin). SHEPHARD said, "Man, what the f**k. How you gonna tell me, man." EVANS said, "That s**t (heroin) is gone. Juice, I've been calling you all day. It's all gone."

SHEPHARD said, "Man, I been in the shop. I've been trying to get this s**t (heroin deal) together man." EVANS said, "I blew through that s**t (heroin)." SHEPHARD said, "I told him (heroin customer) I was out of town so I don't know s**t." EVANS said again, "I blew through that s**t." SHEPHARD said, "I'm being serious." EVANS said, "I'm about to go, ah, I'm about to go, ah, get back together though (obtain more heroin)." SHEPHARD said, "He (heroin customer) on his way back. He coming from Youngstown, so I mean, Warren. I mean, you could, I don't know. That's yours. So they, you, I'll send them to you. They yours."

179. On or about February 9, 2013, at approximately 5:30 p.m., KEITH RICKS called LEAMON SHEPHARD on the telephone. During the call, SHEPHARD complained to RICKS about someone who was supposed to travel to Atlanta as a courier, "He (the courier) ain't never called me." RICKS replied, "Man, that n***a ... man, you gotta holler at Soldier...go holler at Soldier (C.W., a person known to the Grand Jury but not charged herein)." SHEPHARD agreed, and RICKS followed up by saying, "Just call me and say 'yeah' and then I'll tell you what to do then."

180. On or about February 9, 2013, at approximately 5:51 p.m., ANTWONE NOWDEN sent PIERRE A. CAMPBELL a text message that

read, "IM TEXT U AND MT PHONE WAS CUT OFF I NEED 3 BITCCCCC (I tried to text you, but my phone was cut off. I need 3 units of heroin.)"

181. On or about February 9, 2013, at approximately 6:10 p.m., MAURICE GOLSTON called LEAMON SHEPHARD on the telephone. During the call, GOLSTON told SHEPHARD that he was with "Soldier" (C.W.). GOLSTON put C.W. on the telephone to talk to SHEPHARD. After C.W. said, "Hello", SHEPHARD immediately asked him, "Hey, you wanna take a trip?" C.W. agreed to go on the trip, and the two agreed to meet at C.W.'s location.

182. On or about February 9, 2013, at approximately 6:13 p.m., KEITH RICKS called LEAMON SHEPHARD on the telephone. During the call, RICKS asked SHEPHARD, "What's up?" SHEPHARD replied, "I'm about to go bump into him (C.W.). I'll call you in a minute."

183. On or about February 9, 2013, at approximately 6:43 p.m., PIERRE A. CAMPBELL sent ANTWONE NOWDEN a text message that read, "Is it some cut their (do you have some "cut" to increase the quantity of the heroin?)" At approximately 6:45 p.m., NOWDEN sent a response text which read, "HELL NAW (No.)" At 6:45 p.m., CAMPBELL responded, "K (okay.)"

184. On or about February 9, 2013, at approximately 9:14 p.m., DIONTE THOMPSON called LEAMON SHEPHARD on the telephone.

During the call, SHEPHARD said, "What's up?" THOMPSON said, "Hey, 11:30 (the departure time for C.W.'s bus from Cleveland to Atlanta)." SHEPHARD replied, "Huh?" THOMPSON said again, "11:30." SHEPHARD said, "Tonight?" THOMPSON said, "Yeah." SHEPHARD responded, "Alright."

185. On or about February 9, 2013, C.W. traveled by bus leaving at approximately 11:30 p.m. from Cleveland, Ohio, to Atlanta, Georgia. C.W. arrived in Atlanta at approximately 5:20 a.m. on February 10, 2013, and was later met by KEITH RICKS.

186. On or about February 10, 2013, at approximately 5:23 p.m., ERIC C. POWELL placed a telephone call to PIERRE A. CAMPBELL. During the conversation, POWELL asked, "Hey, was it stepped on (was the heroin I just purchased from you mixed with a cutting agent to increase the quantity)?" CAMPBELL responded, "No, that's plain (uncut heroin) right there. You can hit that (mix it with a cutting agent to increase the quantity)." POWELL asked, "Okay, by then what? Nine? Ten? (how much cut can I add to the heroin)?" CAMPBELL responded, "About nine." POWELL stated, "Alright."

187. On or about February 11, 2013, EDWARD F. NIX sold 6.93 grams of heroin to a confidential informant at DOUGLAS T. JOHNSON's residence, while JOHNSON was present.

188. On or about February 12, 2013, PIERRE A. CAMPBELL sold 26.9 grams of heroin to an Undercover Officer posing as a drug dealer, in Cleveland, Ohio.

189. On or about February 13, 2013, a confidential informant contacted EDWARD F. NIX to arrange a sale of heroin. NIX instructed the informant to meet NIX at DOUGLAS T. JOHNSON's residence. There, the informant met with NIX, DOUGLAS T. JOHNSON, and MICHAEL L. JONES. The informant provided money to NIX to purchase heroin. NIX then left to get the heroin and returned a short time later. In the presence of DOUGLAS T. JOHNSON, EDWARD F. NIX provided the informant with 10.30 grams of heroin.

190. On or about February 13, 2013, at approximately 9:39 p.m., LEAMON SHEPHARD sent DOMINIQUE A. BLAIR a text message that said, "Tell yo dude I got flame (high-quality heroin)." At approximately 9:41 p.m., BLAIR sent SHEPHARD a text message in reply that said, "He said he cool he just coped 10 (10 grams of heroin) earlier he said give him a couple of days." At approximately 9:48 p.m., SHEPHARD sent a reply text message to BLAIR that said, "Ok bet."

191. On or about February 14, 2013, at approximately 4:06 p.m., ERIC C. POWELL placed a telephone call to PIERRE A. CAMPBELL. During the conversation, CAMPBELL stated, "Oh s**t, I

got like half a G (1/2 gram of heroin) on me, man! I was lightweight (not in a hurry) headed somewhere. I can stop right there real quick (to sell you heroin) though, but I was headed somewhere." POWELL replied, "Yeah, I need you man (to resupply me with heroin)." CAMPBELL replied, "Alright. I'm coming down Noble."

192. On or about February 15, 2013, PIERRE A. CAMPBELL called an Undercover Officer posing as a drug dealer, and stated that he (CAMPBELL) had just received a large amount of heroin from his (CAMPBELL'S) supplier. CAMPBELL further told the Undercover Officer that CAMPBELL would provide the Undercover Officer with a discount if the Undercover Officer would purchase two ounces of heroin from CAMPBELL instead of one.

193. On or about February 17, 2103, at approximately 5:34 p.m., ROBERT L. FOWLKES, JR. called LEAMON SHEPHARD on the telephone. During the call, SHEPHARD said, "I'm just riding, n***a. State patrol is over here." FOWLKES said, "I'm at, huh? You say who?" SHEPHARD said, "The patrol is over here. State patrol." FOWLKES said, "Ahh man, ... I'm cashed out for my s**t (sold out of heroin). I ain't worried about them, bitch." SHEPHARD said, "Oh." FOWLKES said, "I'm 'bout to come down. I'm gonna call when I get to the gas station in like ten, fifteen minutes."

194. On or about February 18, 2013, at approximately 11:37 a.m., ANTWON EVANS called LEAMON SHEPHARD on the telephone. During the call, EVANS said, "I need you to find me one like right now to give us a read (someone to test a sample of heroin)." Later in the call, EVANS said, "Oh, alright. I need, I need him to give a read (sample the heroin) like right then and there, though, so I don't miss dude (heroin supplier). 'Cause n***a (supplier) be moving, man." SHEPHARD said, "I mean, I mean, are we ready?" EVANS said, "I'm about to go and grab the picture (heroin sample) and they, ah, I'm about to take it up there. I might take it up to your people. Let them give us a read. And then if it's what it is, we good." SHEPHARD said, "Aight. S**t, I'm about to um, I got somebody (to test the heroin) meeting me at the shop and he said he gonna be ready in like 20 minutes. So I'm, ah, I'm getting dressed now, so I'm about to meet him up there. So soon as he get there, I was gonna call you."

195. On or about February 18, 2013, at approximately 10:26 p.m., ANTWON EVANS called LEAMON SHEPHARD on the telephone. During the call, EVANS asked SHEPHARD about the quality of heroin someone had tested for them, "Hey, what your, what your people say, 1 to 10 (about the quality of the heroin)?" SHEPHARD said, "You was with me when they said it." EVANS said,

"Huh?" SHEPHARD said, "I said you was with me when they said it." EVANS said, "Yeah, you said, I got my people, my, my, my, my, my, my man (customer) right here. That's why I said that." SHEPHARD said, "Oh." EVANS said, "Is it, is it a go?" SHEPHARD said, "Like a 7, 8. Huh?" EVANS said, "Is it, is it a go?" SHEPHARD said, "Yeah."

196. On or about February 20, 2013, at approximately 2:16 p.m., ERIC C. POWELL placed a telephone call to PIERRE A. CAMPBELL. During the conversation, POWELL asked, "Yeah, what's up, man?" CAMPBELL responded, "Damn, bro, I ain't even going to lie, man. I'm - I totally forgot (that I was supposed to bring heroin to you), man. I swear to God I did." POWELL stated, "Ahh." CAMPBELL responded, "I swear, I would have been came (to sell you heroin). I totally forgot, man. Where you at?" POWELL replied, "On Woodside, man." CAMPBELL stated, "I can be there in ten minutes, man. I'm headed to you right now (to sell you heroin). I ain't got nobody else to meet (I don't have any other heroin customers to serve). I'm going to (drive to you) right now." POWELL stated, "Alright."

197. On or about February 20, 2013, at approximately 3:01 p.m., a confidential informant contacted EDWARD F. NIX to arrange the purchase of heroin. At that time, NIX was busy. Later that day, at approximately 6:25 p.m., NIX instructed the

informant to go to DOUGLAS T. JOHNSON's house in Cleveland, Ohio. There, the informant met with DOUGLAS T. JOHNSON. During the meeting, the informant and JOHNSON discussed the amount of heroin the informant wanted to purchase from NIX. Eventually, NIX called the informant and instructed the informant to meet NIX at a different location. The informant then left JOHNSON's residence and met with NIX, who sold the informant approximately 24.76 grams of heroin.

198. On or about February 21, 2013, at approximately 11:53 a.m., LEAMON SHEPHARD called MAURICE GOLSTON on the telephone. During the call, SHEPHARD asked, "What's up bro?" GOLSTON said, "Man, come get me. I gotta hit my licks (drug sales), n***a." SHEPAHRD said, "Huh?" GOLSTON said, "Come get me. I gotta hit my licks (drug sales)."

199. On or about February 21, 2013, at approximately 2:23 p.m., DEVONTA P. MAXWELL called LEAMON SHEPHARD on the telephone. During the call, MAXWELL said, "Man, I been waiting on you, man." SHEPHARD replied, "I know. I'm ripping around, trying to grab some (heroin) right quick. I'm gonna call you as soon as I grab it."

200. On or about February 21, 2013, at approximately 3:15 p.m., LEAMON SHEPHARD called DEVONTA P. MAXWELL on the telephone. During the call, MAXWELL said, "S**t man, I'm on

Eddy Road. I was getting ready to go. I was 'bout to go bump in to somebody else (to obtain heroin)." SHEPHARD said, "Alright, I'm on my way. I was waiting for my dude (heroin supplier). That's why I was taking so long."

201. On or about February 22, 2013, at approximately 4:11 p.m., MAURICE GOLSTON called LEAMON SHEPHARD on the telephone. During the call, GOLSTON said, "I need you to come down here like ASAP." SHEPHARD said, "What's wrong?" GOLSTON said, "I need you, I need, on your side (heroin), man." SHEPHARD said, "Alright." GOLSTON said, "No, I need, I'm talking about this, man, I need you to come right now." SHEPHARD said, "What is it?" GOLSTON said, "Man, dude, we both 'bout to make some money, Juice." SHEPHARD asked, "I mean, I'm asking you, what you want me to bring?" GOLSTON answered, "Three ballies (three packages of 3.5 grams of heroin for a total of 10.5 grams)." SHEPHARD answered, "Alright."

202. On or about February 22, 2103, at approximately 4:11 p.m., MAURICE GOLSTON called LEAMON SHEPHARD on the telephone again. During the call GOLSTON said, "Man, yes, he want three ballies (three packages of 3.5 grams of heroin, for a total of 10.5 grams). We can make some money." SHEPHARD said, "How fast. C'mon n***a, hurry up before I go." GOLSTON said,

"Alright, I'm on my way with him right now, man." SHEPHARD said, "Alright, c'mon."

203. On or about February 22, 2013, MAURICE GOLSTON told a confidential informant who had arranged to buy heroin from him that GOLSTON, LEAMON SHEPHARD, DIONTE THOMPSON, and KEITH RICKS had pooled their money together for RICKS to purchase heroin for them in Atlanta, Georgia.

204. On or about February 22, 2013, LEAMON SHEPHARD and MAURICE GOLSTON distributed approximately 7.88 grams of heroin to a confidential informant in Euclid, Ohio.

205. On or about February 27, 2013, at approximately 12:44 p.m., PIERRE A. CAMPBELL called CARLTON A. HIGDON on the telephone. During the conversation, CAMPBELL asked, "What up big dog? What's goin' on?" HIGDON replied, "Who got it, man? You got, it's fire (heroin), ain't it?" CAMPBELL replied, "Yeah, man, that s**t decent, the s**t decent."

206. On or about February 27, 2013, at approximately 1:08 p.m., SANDRA L. MILLER placed a telephone call to RAYMUNDO D. WREN. During the conversation, MILLER asked, "Hello? Hey, you still got that same yellow stuff, that peanut butter looking stuff (heroin) I got off of you the other day?" WREN responded, "Yeah." MILLER asked again, "You sure you still got that?" WREN replied, "Yep." MILLER stated, "I'm telling you; keep

getting that for Dave, seriously." WREN replied, "I know (laughs)." MILLER stated, "'Cause listen, all my people (heroin customers) keep calling me 'cause, like, all their dudes got garbage (poor quality heroin). And...like, my one dude (heroin supplier) I been f**king with (buying heroin from) for like 7 years has garbage who like has never had garbage." Later in the conversation, MILLER asked, "Have you even seen Lee at all? The dude in the green car I met you with?" WREN responded, "Uh-uh. I ain't seen him." MILLER continued, "Well, dude, trust me, he'll be coming through every day (to purchase heroin). I hooked him up with like Max and Rob (other heroin dealers) a long time ago. But, like, that dude spends money. Um, and he even told me that, he's like, and he has - his a habit worse than mine and he does like a G (gram of heroin) a day. And he's like, 'Damn.' He's like, 'That's some of the best s**t I've done in a while.' And I was like, 'I know, dude.' I used to get that same s**t off of Teen (another heroin dealer) a couple years ago. And then when Teen got locked up, I never got it again, so I was so shocked when you had it." WREN responded, "Yeah." MILLER stated, "So, alright then, I'm headed out that way, I'll need fifty (quantity of heroin)." WREN replied, "Okay."

207. On or about February 28, 2013, at approximately 1:57 p.m., PIERRE A. CAMPBELL called CARLTON A. HIGDON on the telephone. During the conversation, CAMPBELL stated, "I'm ready whenever you ready, bleed." HIGDON responded, "Okay, I'm waiting for my people (heroin customers). They say they on they way to me in a little bit. They could be across town, but they coming to me. So when he come to me, I just call you and then grab the money and just come on through." CAMPBELL replied, "Alright."

208. On or about February 28, 2013, at approximately 5:04 p.m., IVAN PERCY placed a telephone call to RAYMUNDO D. WREN. During the conversation, PERCY asked, "I'm, uh, you know my n****r (heroin customer) that be in the Jeep I always send down (to pick up heroin)? You know what I'm saying - or the white car?" WREN responded, "Yeah." PERCY stated, "I'm about to send him down right. I'm 'bout to call you. I'm 'bout to have him call you (to purchase heroin). Just, uh, he know the number to when I tell him to call. Just give him - what you want for a, uh, point three (.3 grams of heroin)? Thirty?" WREN responded, "Yeah, I'll do a thirty (\$30 worth of heroin) for him." PERCY responded, "Nah, listen. Give him the point three (.3 grams of heroin). He gonna give you sixty (\$60.00), and I will come down and get my thirty (\$30.00) from you later, when I get my ride."

WREN responded, "Alright." PERCY stated, "You know what I'm saying. So I'm about to have him call you right now. Alright?" WREN replied, "Alright." On the same date, at approximately 5:27 p.m., IVAN PERCY again placed a telephone call to RAYMUNDO D. WREN. During the conversation, WREN stated "I saved him (sold heroin to your heroin customer)." PERCY replied, "Yeah, he told me you looked out (for him by selling him heroin). I'll call - I'll be down there (to get my money). I'm a come down. I'll call you when I'm on my way down there. S**t, I got to make another stop (heroin sale) first, then I will be down there and I will run into you. You going to be in the hood?" WREN responded, "Probably so." PERCY stated, "You is? Alright, I'll call you. Good looking out - taking care of that (heroin customer) for me, man." WREN replied, "Good, call. You know that ain't no sweat."

209. On or about March 1, 2013, at approximately 9:34 a.m., PIERRE A. CAMPBELL called CARLTON A. HIGDON on the telephone. During the conversation, HIGDON stated, "I'm gonna be hittin' you up in a little bit, man (to purchase heroin). I'm fittin' to get up and make my rounds (sell heroin to my customers) right now." CAMPBELL replied, "Alright." Later in the conversation, HIGDON stated, "Okay, hold me some down like a "G" of it (quantity of heroin) or something, you know what I mean?"

CAMPBELL replied, "Alright." HIGDON stated, "I'm gonna get it. Just hold it for me, my n***a. I just want to go up there and collect my money from the n***a up in Euclid Beach and s**t."

210. On or about March 1, 2013, at approximately 11:10 a.m., IVAN PERCY placed a telephone call to RAYMUNDO D. WREN. During the conversation, WREN asked, "What you want me to do (how much heroin do you want)?" PERCY responded, "It's gonna be - put a one (1 gram of heroin) - Look, what you want for one and a half (1.5 grams of heroin)? WREN responded, "S**t, um, let me see if I got one and half first. I know I got a half. Damn what the f**k she do with that s**t? Let me call you right back (when I find out where) she put this s**t (heroin) at, alright?" PERCY responded, "Alright."

211. On or about March 1, 2013, at approximately 5:09 p.m., GREGORY HAMILTON called PIERRE A. CAMPBELL on the telephone. During the call, HAMILTON said, "I'm through out here (out of heroin), through." CAMPBELL said, "What you mean, you're through?" HAMILTON said, "Huh?" CAMPBELL said, "I said, what you about to get into?" HAMILTON said, "S**t, I'm about to, uh, go holler at my dude (obtain more heroin from his supplier)." CAMPBELL said, "S**t, grab a picture (heroin sample) or something." HAMILTON said, "Uh, alright. You should have told me that this morning." CAMPBELL said, "Did I see you this

morning, n***er? Yeah, I was, I was, I was, wasn't even thinking." HAMILTON said, "I told you n***er, I ain't talking, not him though, uh, I'm a, I'm a stop up there." CAMPBELL said, "Alright." HAMILTON said, "I'm a stop."

212. On or about March 3, 2013, at approximately 1:11 p.m., PIERRE A. CAMPBELL called LAMAR L. MIDDLETON on the telephone. During the conversation, CAMPBELL asked, "Hello?" MIDDLETON asked, "What up, what up (how was the heroin)?" CAMPBELL answered, "That wasn't the same thing, man (the heroin wasn't as good)." MIDDLETON asked, "Huh?" CAMPBELL answered, "That wasn't the same thing." MIDDLETON stated, "S**t, that was the same demo (heroin). What, they (your heroin customers) don't like it?" CAMPBELL answered, "I mean, it's already gone (sold), but they texting and s**t (the customers are contacting CAMPBELL to complain). I didn't even answer." MIDDLETON stated, "No, that was the same demo. I just had some at the house." CAMPBELL replied, "It's lighter (the color of the heroin is different)." MIDDLETON answered, "It's all the same. I (unintelligible) those three. What they say?" CAMPBELL stated, "Doesn't work, n***a (the heroin doesn't get the users high)." MIDDLETON stated, "(unintelligible) just f**kin' with you, man." CAMPBELL replied, "When I looked at it, I was like, I, I, I, I,

had already said it in my head." MIDDLETON stated, "Man, that's all the same demo. I just had it all night. . ."

213. On or about March 4, 2013, at approximately 12:27 p.m., RYLAND L. HARRIS, JR. called LATRICE N. BLEVINS on the telephone. During the conversation, BLEVINS stated, "Hello?" HARRIS asked, "Yeah, Dave (PIERRE A. CAMPBELL) around?" BLEVINS replied, "What you need, babe?" HARRIS stated, "Uh, I need to holler at Dave (CAMPBELL) if I can. This Slim." BLEVINS replied, "I know who this is, Slim. I'm handling Dave's phone, so I was wondering I could help you." HARRIS replied, "Oh, okay, you handling his phone and running the store (conducting drug transactions), too?" BLEVINS replied, "Yeah." HARRIS stated, "Okay, uh . . ." BLEVINS laughs. HARRIS continued, "I got you, I got you. Oh, I want to get to the ball game here. You hear me?" BLEVINS replied, "Okay, I hear you. What you need?" HARRIS replied, "Uh, eight ball (3.5 grams of heroin). BLEVINS stated, "Okay, let me - didn't you call yesterday? Did you call me yesterday?" HARRIS stated, "Yeah, I sure did, but time got away from me. You know, and - and I got, that guy Slim (RAYMUNDO D. WREN), or P (PIERRE A. CAMPBELL) or whoever the cousin supposed to be." BLEVINS replied, "Uh-huh." HARRIS stated, "Yeah, I mean, everything was all right on the, on the size and s**t but that action wasn't s**t (the weight of the

heroin was correct, but the quality was poor)." BLEVINS replied, "Oh, okay." HARRIS continued, "That action wasn't s**t. I needed something that's going, you know, do what it's supposed to do (make his heroin customers high)." BLEVINS responded, "Exactly." HARRIS stated, "You know, yeah, you ain't gotta make me a cake or nothing, you know, what I mean, just, it ain't gotta be all like that (the heroin doesn't have to look perfect). Just long as do what is supposed to do (so long as it makes my customers high)." BLEVINS replied, "Exactly." HARRIS continued, "Yeah, and I want to look before I leap (try the heroin before I buy a larger quantity), you know what I mean? Were you with him when he came down Bender?" BLEVINS replied, "Uh-uh, I wasn't with him but, was it real, was it (the heroin) real light colored? Or was (the heroin) butter colored?" HARRIS replied, "Yeah, yeah. It was light tannish. It was almost beige. Damn near white. I want something dark and ugly (strong), you know?" BLEVINS stated, "I feel ya." HARRIS asked, "Yeah, yeah, you got that (dark colored and strong heroin)?" BLEVINS replied, "What are you, what did he charge you? 'Cause I got the dark and ugly." HARRIS stated, "Okay, uh, if you go the dark and ugly then, uh, the last time I got an eight ball (3.5 grams) from he charged me three (\$300). You know." BLEVINS stated, "Oh." HARRIS continued, "And an eight

ball is like three and a half (3.5 grams of heroin) whew wee, this- this is ugly conversation (it is dangerous to openly discuss drug transactions over the telephone) like this. Um, three and a half g's for three (3.5 grams for \$300). BLEVINS stated, "Slim-". HARRIS stated, "Uh-." BLEVINS continued, "I fitting to call you from another phone (I'm going to call you from another phone to ensure that the conversation is not being intercepted by law enforcement)." HARRIS stated, "Okay, please do that. 'Cause I know this one is clean (I'm sure this phone is not being intercepted by law enforcement)."

214. On or about March 4, 2013, at approximately 3:06 p.m., MARCUS BLUE called LEAMON SHEPHARD on the telephone. During the call, SHEPHARD asked, "What's the deal?" BLUE said, "I need some help." SHEPHARD said, "'Bout what? What happened?" BLUE said, "Nothing n***a. You already know what I'm talking about (sharing heroin)." SHEPHARD said, "Oh, you got some (heroin)?" BLUE said, "Yeah" SHEPHARD asked, "Alright, s**t, uh, my way? Or your way, or what?" BLUE answered, "Our way. The only way I'm gonna call you." SHEPHARD said, "My way?" BLUE said, "Yeah." SHEPHARD said, "S**t, you already know what's up."

215. On or about March 4, 2013, at approximately 3:22 p.m., LEAMON SHEPHARD called MARCUS BLUE on the telephone. During the call SHEPHARD asked, "Hey what color (is the heroin)?" BLUE

answered, "Like a tannish brown color." SHEPHARD said, "Tannish brown. How is it? Is it good?" BLUE said, "Yeah. It's good." All my people like the, the nose (heroin users who snort it) they say is great, but the, you know what I'm saying, the banger (heroin users who inject it), they was saying a little less. You feel me?" SHEPHARD said, "Alright. I mean, s**t, come holler at me and we will do what we was talking about. You know what I'm saying?" BLUE said, "I'm 'bout to come holler at you in like an hour. He just called me." SHEPHARD said, "Alright. I'm gonna go up to the shop." BLUE said, "Alright."

216. On or about March 4, 2013, at approximately 4:50 p.m., RYLAND L. HARRIS, JR. called PIERRE A. CAMPBELL on the telephone. During the conversation, HARRIS stated, "Okay, uh, dude (heroin customer) just text me saying he'll be here a little past a half hour, something like thirty, forty-five minutes. I don't know how long it will take you exactly but put, uh, he going to be in and out. I'm going to come out too. You won't have to meet nobody else." CAMPBELL replied, "Alright." HARRIS stated, "So put two (quantity of heroin) on one side and one and a half (separate quantity of heroin) on the other side, cause he got somebody (another heroin customer) with him. And, uh, he just going to send me in with the money and the ruler (scale). So I can make sure they - their thing is

together. I mean - just bring the money into you, okay?"

CAMPBELL replied, "Alright."

217. On or about March 5, 2013, at approximately 11:29 p.m., PIERRE A. CAMPBELL called LAMAR L. MIDDLETON on the telephone. During the conversation, CAMPBELL stated, ". . . I goin' to need some twarts (heroin)." MIDDLETON stated, "Alright, what (amount of heroin) you want?" CAMPBELL stated, "I don't know, leave something n***a. I don't know how long you gonna be gone (out of town)." MIDDLETON stated, "Alright, alright, I'm going to make something nice (an amount of heroin) for you and put it together. I'm going to leave it (the heroin) in the spot (stash house). I'm going to let you know when it's (the heroin is) there." CAMPBELL stated, "Alright."

218. On or about March 5, 2013, at approximately 2:14 p.m., LEAMON SHEPHARD called KEITH RICKS on the telephone. During the call, RICKS said, "...I need, hey, it's some stuff (heroin) supposed to come, some mail supposed come over Michelle's house. I want you go over there and check." SHEPHARD said, "When?" RICKS said, "Today." SHEPHARD said, "Alright."

219. On or about March 5, 2013, at approximately 2:41 p.m., DOMINIQUE E. IVORY called LEAMON SHEPHARD on the telephone. During the call, SHEPHARD asked IVORY, "What you 'bout to do?" IVORY said, "S**t, I'm catch, I'm meeting a couple people real

quick." SHEPHARD said, "Oh, what they say about that? It's (is the heroin) cool?" IVORY responded, "Um, no, they said they don't like that s**t (heroin)." SHEPHARD said, "You said they don't like it?" IVORY said, "No, hell no. I came back today. They say they don't want that s**t (poor quality heroin)." SHEPHARD said, "Alright." IVORY said, "What you about to do?" SHEPHARD said, "S**t, nothing. Uh, try to see something different (check on a different supply of heroin)." IVORY said, "Alright, if something come through, let me know."

220. On or about March 5, 2013, at approximately 3:51 p.m., DEVONTA P. MAXWELL called LEAMON SHEPHARD on the telephone. During the call, MAXWELL said, "Man, that s**t's (heroin) garbage, man." SHEPHARD said, "Man, get outta here." MAXWELL said, "I swear to God, man." SHEPHARD said, "Man." MAXWELL said, "I ain't even trippin', though, 'cause that's (poor-quality heroin) goin' around everywhere, man."

221. On March 6, 2013, at approximately 11:53 a.m., PIERRE A. CAMPBELL called LAMAR L. MIDDLETON on the telephone. During the conversation, MIDDLETON stated, ". . . It's (the heroin is) at the house, bro." CAMPBELL replied, "Right now?" MIDDLETON stated, "I'm sayin' my dude (another heroin dealer) there, so whenever (you want to come over for the heroin). It don't matter when you go." CAMPBELL stated, "Alright, you gone (out

of town)?" MIDDLETON replied, "Yeah, I'm about to get ready to jump on this freeway (to go out of town)." CAMPBELL stated, "Alright . . ."

222. On or about March 7, 2013, at approximately 11:06 a.m., JERMAINE D. GRAYSON called LEAMON SHEPHARD on the telephone. During the call, GRAYSON said, "Okay, I'm only bringing a couple hundreds with me. I just wanna see what it's (the heroin) like first." SHEPHARD said, "That's cool." GRAYSON said, "And then I'll spend a whole stack (\$1,000) with you or something." SHEPHARD said, "I ain't trippin'."

223. On or about March 7, 2013, at approximately 12:47 p.m., JERMAINE D. GRAYSON called LEAMON SHEPHARD on the telephone. During the call, GRAYSON said, "I'm impressed with this (heroin), bro. I need some more (heroin)." SHEPHARD said, "Huh?" GRAYSON said, "I said, I'm impressed with this. I need some more. What's up?" Later in the call, GRAYSON said, "I'm probably 'bout to spend another band (\$1,000) with you on this (heroin). Just make sure it's the same s**t (heroin)." SHEPHARD said, "S**t, I'm 'bout to call you when I get back to the shop. You pick me up? (unintelligible) ride." GRAYSON agreed, "Yeah, I'm a come and get you, bro."

224. On or about March 7, 2013, at approximately 12:47 p.m., RYLAND L. HARRIS, JR. called PIERRE A. CAMPBELL on the

telephone. During the conversation, HARRIS stated, "This is not the one, man." CAMPBELL asked, "What you mean?" HARRIS repeated, "This is not the one." CAMPBELL asked, "What's wrong with it?" HARRIS stated, "It is garbage. Ain't no punch (the heroin is not making HARRIS and/or his customers high). It is gone. It's leaving lots of residue. This is not the one. This been beat up. Somebody over hit it (the heroin has been cut too much). I been doing this since '68, man, don't do this to me, man. I'm all right. I come to you, right? Please don't do this to me." CAMPBELL replied, "This what I'm going to do. I'm going to bring you something else (replacement heroin), man. Give me like an hour, 'cause I gotta make a run (heroin sale). I ain't petty." HARRIS replied, "Okay, man."

225. On or about March 7, 2013, at approximately 12:50 p.m., IVAN PERCY placed a telephone call to LATRICE N. BLEVINS. During the conversation, BLEVINS asked, "Hey, Ive (PERCY), you coming my way (to purchase heroin)?" PERCY responded, "Uh, I probably goin', uh, I probably, probably, it's going to be little later and s**t. I was going call Bo (RAYMUNDO D. WREN) but I - I heard what happened, so I said, 'let me call you and see what's up.' It'll probably be around either I'm going to come (to purchase heroin), or I'm gonna send my, you know, or I'm gonna send somebody (my heroin customer) at you (to your

location to pick up the heroin)." BLEVINS replied, "Oh, that's, that's, that's beautiful. Just let me know how much you charge them or whatever." PERCY stated, "Right, right. I already got it worked out. We'll break bread (share the profits from the deal). You know what I'm saying?" BLEVINS responded, "Okay." PERCY stated, "So, you going to eat, Imma eat. (we'll both get a share of the profits of the heroin transaction). So you know what I'm saying. It ain't gonna be nothing heavy (the customer won't be purchasing a large quantity of heroin). But you know it's better than, you know what I'm saying, something." BLEVINS responded, "Exactly." PERCY stated, "Alright, so it will probably be about five or six (5:00 or 6:00 p.m.)." BLEVINS replied, "Okay, just call me. 'Cause I'm out and about now and I was about to turn back around. But just call me when you ready (to conduct the heroin transaction)." PERCY replied, "Okay, alright." BLEVINS stated, "Okay, babe."

226. On or about March 7, 2013, at approximately 2:48 p.m., JERMAINE D. GRAYSON called LEAMON SHEPHARD on the telephone. During the call, GRAYSON said, "I'm 'bout to. I'm on my way over there now. Hey, for five of them (5 grams of heroin), just, I want five of them (5 grams of heroin)." SHEPHARD said, "Alright, that's cool. I'll call you as soon, give me a minute, 'cause I had to make a run right quick. I'm a call you as soon

as, soon as I get there." GRAYSON asked, "Alright. This is gonna be that same s**t (heroin)?" SHEPHARD said, "Yeah, I ain't switch it up. You know I don't play no guy like that. We ain't gonna do that."

227. On or about March 7, 2013, LAMAR L. MIDDLETON possessed two handguns, 9.3 grams of heroin, 2.3 grams of cocaine, two grinders with heroin residue, a scale with cocaine and heroin residue, a hammer with heroin residue and a press designed for compressing heroin and/or cocaine for resale.

228. On or about March 7, 2013, at approximately 2:48 p.m., LAMAR L. MIDDLETON called PIERRE A. CAMPBELL on the telephone. During the conversation, MIDDLETON stated, "They raided my house, man." Campbell asked, "Huh?" MIDDLETON repeated, "The police raided my house, man." CAMPBELL stated, "Man, get the f**k outta here." MIDDLETON stated, "Swear to God, man. They took- took 2 straps (guns), about 5 G's (grams of heroin), clocks (scale), the blenders, all that shit." CAMPBELL exclaimed, "Oh my f**kin' God, man."

229. On or about March 9, 2013, at approximately 1:08 p.m., SANDRA L. MILLER placed a telephone call to LATRICE N. BLEVINS. During the conversation, MILLER stated, "Yeah, he's, he's (MILLER's heroin customer) like, 'dude,' he's like, 'That's the best s**t (heroin) I've ever done.' I'm like, 'I told you.'"

It's like an absolute 10 (very high quality heroin)." BLEVINS responded, "Thank you. I'm not putting nothing on it (cutting the heroin) either. I'm just getting it and giving it to y'all." MILLER stated, "And listen, I was like so stressed, and there's cops on every corner, and I'm just doing it while we're driving. And I missed half of it, and it still f**ked me up." BLEVINS responded, "Uh, well, I ain't gonna do nothing to it . . . I'm gonna leave it as is. And I thank you, SANDY." MILLER stated, "Yeah, I'm actually, I'm saving a little, uh, to give to one of my cousins, 'cause I want him to try it. 'Cause I know he gonna want some tomorrow, too. So" BLEVINS responded, "Ok. Well, I (unintelligible)." MILLER stated, "Yeah, I will be out to see you tomorrow (to purchase more heroin) and then I will give you that 10 (amount of money) I owe you." BLEVINS responded, "Ok. It wasn't 10 either, SANDY." MILLER stated, "Oh, 7. 7." BLEVINS stated, "Ok."

230. On or about March 10, 2013, at approximately 5:28 p.m., PIERRE A. CAMPBELL sent ANTWONE NOWDEN a text message that read, "Lol i got 5 for 4 (I'm selling five grams of heroin for \$400) right now(.)" At approximately 5:54 p.m., NOWDEN sent a response text which read, "OK BITCCCCC(.)"

231. On or about March 14, 2013, at approximately 6:41 p.m., PIERRE A. CAMPBELL placed a telephone call to DARNELL

ALEXANDER, JR.. During the conversation, CAMPBELL stated, "The same thing like last time (same quantity of heroin as our last transaction). Be there in 15 minutes." Later in the conversation, CAMPBELL repeated, "No, I said the same move as last time. (unintelligible) 15 minutes." ALEXANDER responded, "Oh, alright, alright." CAMPBELL asked, "You hear me?" ALEXANDER replied, "Alright."

232. On or about March 14, 2013, at approximately 7:28 p.m., PIERRE A. CAMPBELL placed a telephone call to DARNELL ALEXANDER, JR.. During the conversation, CAMPBELL stated, "This n***a talkin' about you done gave him some fake s**t (a drug customer is claiming that you sold him fake heroin)." ALEXANDER exclaimed, "Man, get the f**k outta here, man." CAMPBELL responded, "I swear, he told me that s**t went to goop." ALEXANDER asked, "Went to goop?" CAMPBELL stated, "Yeah, he can't even do nothin' with it." ALEXANDER stated, "Man, where the f**k he at?" CAMPBELL replied, "He's still up there." ALEXANDER asked, "He is?" CAMPBELL made an unintelligible response, after which ALEXANDER stated, "I'm gonna swing - I'm gonna swing down on him."

233. On or about March 14, 2013, at approximately 8:46 p.m., ERIAN J. HARWELL called LEAMON SHEPHARD on the telephone. During the conversation, HARWELL asked SHEPHARD, "You ain't got

nothing (heroin) for me?" SHEPHARD responded that he did, and HARWELL requested "two of them (quantity of heroin)." SHEPHARD instructed HARWELL to come meet him at SHEPHARD's father's automotive repair shop.

234. On or about March 15, 2013, at approximately 9:39 a.m., PIERRE A. CAMPBELL placed a telephone call to DARNELL ALEXANDER, JR.. During the conversation, CAMPBELL stated, "Man, you was just callin' me?" ALEXANDER replied, "Ya. What's up? Where you at?" CAMPBELL stated, "I'm here to see you right now (to conduct a heroin transaction) (unintelligible). You know, I had, I had to run over to the house, man (to pick up more heroin)." ALEXANDER replied, "Alright." CAMPBELL stated, "Yeah, I ain't gonna leave you hangin' (without heroin), bro. Trust me, man. I wouldn't have told you to come if I was gonna leave you hanging man. I ain't about to leave you hangin'." ALEXANDER stated, "Alright. I'm here." CAMPBELL replied, "Alright."

235. On or about March 15, 2013, DARNELL ALEXANDER, JR.. possessed 4.6 grams of heroin in Euclid, Ohio.

236. On or about March 15, 2013, at approximately 9:53 p.m., LEAMON SHEPHARD called MACEO MOORE on on the telephone. During the call, MOORE told SHEPHARD, "I'm waiting on you." SHEPHARD replied, "I'm on my way down there. I'll give you what

I owed you." MOORE said, "Yeah. We in the barbershop. Come in the barbershop. Everybody in here." SHEPHARD responded, "I'm on my way down there right now." Both then ended the conversation by saying, "Alright."

237. On or about March 17, 2013, at approximately 6:56 p.m., LEAMON SHEPHARD called JERMAINE D. GRAYSON on the telephone. During the call, GRAYSON said, "I don't know. Just bring like, just bring like a couple G's (grams of heroin) though, like s**t, four or five (4 or 5 grams of heroin)."

238. On or about March 18, 2013, at approximately 12:12 p.m., LEAMON SHEPHARD called JERMAINE D. GRAYSON on the telephone. During the call, GRAYSON said, "I need a couple them bitches (heroin) from you." SHEPHARD said, "Alright, s**t. When you ready?" GRAYSON said, "You rocked it (re-compressed the heroin after diluting it) already?" SHEPHARD said, "Hell no." GRAYSON said, "So it's not just powder? Is it better than last s**t we had, or the same?" SHEPHARD said, "Hell no. It's better than that s**t." GRAYSON said, "Can you re-rock (compress) it before I get it?" SHEPHARD said, "Yeah, but I ain't got nowhere to drop it though, 'cause I need the, um, I need to use my, I need to use a stove."

239. On or about March 19, 2013, at approximately 9:23 p.m., ROBERT L. FOWLKES, JR. called LEAMON SHEPHARD on the

telephone. During the call, FOWLKES said, "... Trying to contemplate these moves (drug transactions), man. Trying to put this money together and make something shake." SHEPHARD said, "Now, what's up? I'm trying to come over there and take some. What's up?" FOWLKES said, "Aww, man. I'm saying. Listen though. For what you do, I'm telling you, man, you know I had a couple plays (drug transactions) for you before, but you ain't never really get back at me, but I already." SHEPHARD interrupted, "Man, but you were, I was in and out. I couldn't sit still. You already know that s**t though. N***as was moving. I was in traffic. I was moving." FOWLKES said, "I'm trying to see where it's at through, for real, for real." SHEPHARD said, "You lying. You ain't trying to come on over here and come f**k with me, man (deal in heroin with me)." FOWLKES responded, "I'm trying to tell you Juice Man." SHEPHARD said, "I told you when I first started (selling heroin) it was plentiful (lots of heroin to sell), bro."

240. On or about March, 21, 2012, at approximately 11:06 a.m., JOVAN FUSSELL called PIERRE A. CAMPBELL on the telephone. During the conversation, CAMPBELL asked, "Where you at (so we can meet to conduct a heroin transaction)? FUSSELL replied, "Uh, right here on, uh, Mayfield (Road, Cleveland, Ohio)." CAMPBELL stated, "Gonna throw some clothes on real quick."

FUSSELL replied "Okay." CAMPBELL asked "Where you gonna be at? I need like forty-five, 'bout thirty, forty-five minutes (before I'm ready to purchase the heroin from you)." FUSSELL replied, "Alright, just call me and we'll link up (to conduct the heroin sale)."

241. On or about March, 21, 2012, at approximately 5:40 p.m., PIERRE A. CAMPBELL called JOVAN FUSSELL on the telephone. During the conversation, FUSSELL stated "You want to, um, meet at Save More's (to conduct the heroin transaction)?" CAMPBELL replied, "That's cool. How long you going to be?" FUSSELL responded, "Like fifteen minutes."

242. On or about March 22, 2013, at approximately 7:32 p.m., PIERRE A. CAMPBELL sent a text message to JOVAN FUSSELL which read, "Leavn mentor I got 300 4 u im a hit u soon as I get down (I am leaving Mentor, Ohio. I have \$300 to pay you for heroin. I will contact you when I get to your location.) FUSSELL sent a text message in response which read, "Cool(.)"

243. On or about March 26, 2013, at approximately 1:40 p.m., LEAMON SHEPHARD called MAURICE GOLSTON on the telephone. During the call, SHEPHARD said, "I'm about to come get you. My dude say he want to try your stuff (heroin). If it's cool, he'll score, you hear me?" GOLSTON said, "Where you at?"

SHEPHARD said, "I'm on my way. I'm 'bout to go drop my daughter off and then I'll come pick you up." GOLSTON said, "Alright."

244. On or about March 27, 2013, at approximately 11:55 a.m., L.W., a person known to the Grand Jury but not charged herein, called LEAMON SHEPHARD on the telephone. Previous to the call, a package of heroin had been delivered to the auto shop owned by SHEPHARD's father, Leamon Eddie, where L.W. worked. L.W. received the package, opened it, suspected it contained drugs, and kept the package in his car until associates of SHEPHARD confronted L.W. and retrieved the package. During the call, L.W. explained to SHEPHARD, "Hey, yeah, man. We got to rap, man. I wasn't trying to take nothing from nobody. That wasn't my point of what I was trying to do, brother. I got to, I'm signing for s**t, man. My name on s**t, bro. And my name up there, man. Something go down, I'm going to jail, brother. I didn't know nothing about nothing. You follow what I'm saying? I didn't know to even look out for anything. That's what I want to holler at your old man (Leamon Eddie) about. It can't be like that. 'Cause I never do no s**t like that to him. Or you. Period. I never do no s**t like that, man. I don't know what the f**k going on. That's like a n***a being a sitting mother f**king duck, man. You don't know what the f**k going on, next thing you know the rollers (police) got you. You

like, damn, I ain't do nothing. I don't know nothing. C'mon man. That s**t happen every day." SHEPHARD said, "So where you was you going with it, though?" L.W. said, "No, I putted the s**t up because I was gonna get with him and give it directly to him, man, and tell him to stop that s**t." SHEPHARD said, "But you opened it. You opened it, dude. You opened it." L.W. said, "Yeah, yeah, yes, 'cause I wanted to know what the f**k it was." SHEPHARD said, "It ain't got nothing to do with you though, dog." L.W. said, "Man, brother, it got everything to." SHEPHARD said, "Alright, alright, alright, I'll catch up with you later."

245. On or about March 27, 2013, at approximately 11:56 a.m., KEITH RICKS called LEAMON SHEPHARD. During the call, RICKS asked, "Where you at?" SHEPHARD said, "I'm on my way (with the package that had been retrieved from L.W.), n***a." RICKS said, "I mean, dude (heroin customer) waitin' on me. I'm tryin' to hurry up before dude pull off. You know what I'm sayin'?" SHEPHARD said, "I'm on my way brother." RICKS said, "I know." SHEPHARD said, "I'll be there in 10 minutes." At 12:08 p.m., SHEPHARD called RICKS, who said, "Where you at?" SHEPHARD said, "I'm outside." RICKS said, "Alright."

246. On or about March 27, 2013, at approximately 4:22 p.m., LEAMON SHEPHARD called ROBERT L. FOWLKES, JR. on the

telephone. During the call, SHEPHARD asked, "S**t, how you looking? How you looking on your side (heroin)? You cool?" FOWLKES responded, "Uh, s**t, for real, for real, I mean damn. There's always room to do more though (sell more heroin). Yeah, I mean, s**t." SHEPHARD said, "S**t, I'm loaded (with heroin). Call me." FOWLKES asked, "On, on my side (heroin), though?" SHEPHARD said, "Yep." FOWLKES said, "Damn, hey, s**t." SHEPHARD said, "I'm 'bout to go, I'm 'bout to go, I'm 'bout to come, I'm 'bout to swing over there right now. Here I come. Yep." FOWLKES said, "Alright."

247. On or about March 29, 2013, MACEO MOORE and J.J., a person known to the Grand Jury but not charged herein, burglarized the residence of DAMMARKRO SHERRON NOLAN, SR., in Painesville, Ohio, in an effort to steal heroin, money and valuables. Among the items reported stolen was a "Brightin" (sic.) watch valued at \$6,000.

248. On or about April 4, 2013, at approximately 1:56 p.m., MAURICE GOLSTON called KEITH RICKS on the telephone and warned RICKS that the police were in the neighborhood near RICKS' mother's house on East 118th Street looking for RICKS' brother DIONTE THOMPSON. RICKS asked, "Why you say that?" GOLSTON said, "'Cause they keep riding past this bitch. I'm right here at the top of 118th." RICKS said, "They keep on riding past,

coming down 118th, huh?" GOLSTON said, "Yeah, up and down. They all around. They and them, uh, Dennis the Menace and them." RICKS said, "Are they with him?" GOLSTON replied, "Huh, no Dennis the Menace by his self though." RICKS said, "I'm sayin' though, I mean, you say it's the regular police?" GOLSTON said, "No, the Chargers ain't. The Chargers is detectives, white boys." RICKS asked, "Detectives? White boys?" GOLSTON confirmed, "Yup." At approximately 2:02 p.m., KEITH RICKS called GOLSTON back to discuss the police GOLSTON had seen. GOLSTON told RICKS the police were gone. RICKS instructed, "Hey, when they, next time they do that s**t, tell Kirb, wear a black hoodie and stand in the front yard. With his head down." GOLSTON said, "He at the house?" RICKS said, "I don't know. Know what I'm saying? That's so playas (drug traffickers) know what they doing. Know what I'm saying?"

249. On or about April 6, 2013, at approximately 11:47 a.m., MAURICE GOLSTON called KEITH RICKS to discuss a plan to rob a drug dealer. During the call, GOLSTON said, "Hey, that n***a car in his driveway, pull around here." RICKS said, "No, no, knock. You knock on the door." GOLSTON said, "I can't go over there, you know I can't go over there. I beat they brother up." RICKS said, "No, blow the horn. Be like, 'Man, what I supposed to tell him, you know, that n***a get mad.' You know

what I'm saying?" GOLSTON said, "Alright." RICKS said, "Then, you know what I'm saying? Then that will get me okay, you know, if he say, yeah, it's you, that will give me okay to like, when I see him, I ain't got to talk. Feel me?" GOLSTON said, "Yeah, alright." RICKS continued, "And I'm gonna be right there with his pockets out, you know what I'm saying? I know where the stash spot (location where drugs and money are stored), where his stash spot's at." GOLSTON said, "Alright."

250. On or about April 16, 2013, at approximately 2:15 p.m., KEITH RICKS called MARCUS BLUE on the telephone. During the call, RICKS and BLUE discussed a possible robbery target RICKS had been scouting. RICKS said, "It ain't mission impossible, but it gonna be hard, bro." BLUE said, "Why, 'cause that fence?" RICKS said, "I checked everything out. I'm gonna talk to you 'bout it when I see you." Later in the conversation, BLUE and RICKS discussed another possible robbery target. RICKS said, "Hey, oh yeah, too, damn! I seen Wash, I seen Washington. He was at the barbershop, right." BLUE said, "Yeah." RICKS said, "Do you think that bitch would keep something in his car, man?" BLUE said, "Do I think what?" RICKS said, "You think bitch be keeping that s**t (heroin) in his car or some s**t? It was parked in the parking lot where he couldn't see. He couldn't see if I was to bust a window out.

He couldn't see. I'd be cool." BLUE said, "I don't know. He probably be having some paper (money) in there." RICKS said, "What you think?" BLUE said, "Mmm." RICKS said, "Probably have some paper (money) in there?" BLUE said, "Yeah."

251. On or about April 16, 2013, at approximately 5:12 p.m., KEITH RICKS pulled up next to a vehicle that he had seen parked near his house and then followed, calling and asking others if they knew who was in the car. RICKS honked his horn and knocked on the driver's window and asked, "Hey, why you sitting in front my people's house?" RICKS told the driver, "Hey, hold on. Alright, alright, alright. Ain't no disrespect. Naw, naw, n***as be around there robbing, doing some bulls**t. You know what I'm saying? And the only reason we came out 'cause we see car parked." Further, RICKS explained, "Okay, okay. Naw, we just, mother-f**kers be around there doing some bulls**t, you know what I'm saying? I seen the car and ain't nobody hop out. You know what I'm saying? I was just checking to see what's going on." After being satisfied with the driver's response, RICKS let the driver leave in his car.

252. On or about April 17, 2013, at approximately 11:02 a.m., KEITH RICKS called MACEO MOORE on the telephone. During the call, RICKS told MOORE, "Hey, man, listen, man. Let me ask you a question, man. Could you do me a favor, man?" MOORE

replied, "What?" RICKS said, "You know I don't ask you for much, right? For real, man, I don't ask for much, MACEO. Man, I just need one favor from you, man." MOORE replied, "What's that?" RICKS said, "Man, turn me onto something (a heroin deal or a robbery target), man." MOORE responded by asking, "What you mean?" and RICKS replied, "Man, you already know!" MOORE asked, "A ho (woman)?" RICKS said, "No n***a! F**k a ho, I got hoes!" MOORE then asked RICKS, "Where you at?" They spoke for a few more moments and then agreed to meet.

253. On or about April 17, 2103, at approximately 10:33 p.m., KEITH RICKS called an unidentified male known as "Mack" on the telephone about a burglary "Mack" was attempting to commit on behalf of RICKS. During the call, Mack said, "Yeah, we couldn't get through them yards. We gonna have to go around." RICKS said, "You said what? You said what? Man, listen, you gonna need to hop this fence. Y'all can have a straight shot in one of them yards. You know, trust me. Hey listen, hello?" Mack said, "Yeah." RICKS said, "Yeah, listen, listen, listen bro, bro, bro, listen, listen you need to go to the yard across the street, you hear me?" Mack said, "Uh-huh." RICKS said, "Listen, tell Adrian: if he see him, come out with a bat, n***a, make that n***a drop that bitch and grab that bitch and come to the car n***a." RICKS continued to give instructions, "Go in

the yard, go in the yard across from his. Like, listen, listen, you know where I dropped you off at?" Mack said, "Yeah." RICKS said, "Listen, all you to do is go through one of them back yards. You go through one of them back yards. I did it before." Later in the call, it became clear the target of the robbery had just left. Mack said, "Lookin' for his house. That car gone, cuz, that car gone. RICKS said, "Damn man, you all took too f**king long, man." Mack confirmed, "That car gone, cuz." RICKS said, "Damn, man." RICKS said, "He pulling off, he pullin' off right now."

254. On or about April 18, 2013, at approximately 10:10 a.m., MARCUS BLUE called KEITH RICKS on the telephone. During the call, RICKS complained to BLUE that a robbery attempt the previous night had failed. RICKS said, "Man, these n***as man, this, man, man, man, I had a, I had a, I had a good one, but these n***as f**ked it up, man."

255. On or about April 18, 2013, at approximately 8:32 p.m., KEITH RICKS called MARCUS BLUE on the telephone. During the call, RICKS asked, "What's up?" BLUE said, "This s**t some show and tell (showing a heroin supplier money to arrange a later purchase of heroin), but I'm about to go on this s**t for sure, bro. I'm about to go right here, man." RICKS said, "So, so, so, listen, listen, listen. I, I, I ain't f**k with no, I

ain't got no f**king money for no show and tell. I ain't doing no show and tell."

256. On or about April 18, 2013, at approximately 8:51 p.m., KEITH RICKS called MARCUS BLUE on the telephone. During the call, RICKS complained to BLUE that BLUE had sent him to the wrong address to commit a robbery the previous night. During the call, RICKS said, "I'll tell you what this man said: 'You sent me on a dummy street, man.' Come on man." BLUE responded, "Okay, how am I gonna sent you on a dummy street when we both know that is the street, bro. I said, I don't know the house. That is what I told the n***a."

257. On or about April 19, 2013, at approximately 11:43 a.m., MAURICE GOLSTON called KEITH RICKS on the telephone. During the call, RICKS discussed with GOLSTON what he had heard about the burglary of DAMMARKRO SHERRON NOLAN, SR.'s, residence in Painesville, Ohio, on March 29, 2013, by MACEO MOORE and J.J., a person known to the Grand Jury but not charged herein. RICKS told GOLSTON, "That n***a Lee, pushed up on me right, he like, 'I have a sweet one' right?" According to RICKS, "Lee" said, "They (MOORE and J.J.) missed it." RICKS said he asked "Lee," "What they miss?" According to RICKS, "Lee" answered that, "[T]hey missed sixty thousand (\$60,000) and a mink coat, and there was a door behind a suit rack that had seven hundred

and thirty thousand." RICKS then explained to GOLSTON that he asked "Lee," "Who missed it?" "Lee" responded that "Paper" (MACEO MOORE) had missed it. RICKS then complained to GOLSTON about the fact that MOORE had apparently planned such a large robbery and not included RICKS, saying, "...it happened two weeks ago! You know what I'm saying? I was here (in Cleveland, not Atlanta)! You know what I'm saying? Like, then we was just kicking it! You know what I'm saying?" RICKS explained that "Lee" reiterated that the robbery was still available for them to do. According to RICKS, "Lee" told him, "Listen, it's still a go. My people will find out where it's at and I'ma call you." RICKS explained further, "So I'm thinking this through, I'm like, who did Paper (MACEO MOORE) take? He took some other n***as? Or off brand n***as?" GOLSTON replied, "Of course he did."

258. On or about April 19, 2013, at approximately 12:21 p.m., KEITH RICKS called MACEO MOORE on the telephone. During the call, RICKS said, "Hey, remember old boy (drug trafficker). Remember, I did that, did that to (robbed him)?" MOORE said, "Yeah." Later in the call, RICKS explained, "You know what I'm saying, so my little n***er say like, you know what I'm saying, he talking to Mun. Mun be like, n***er, know what I'm sayin', this the guardsman, this n***er got it! Woo woo! Like, you know

what I'm saying? My little n***er say every time he be talking to Mun, Mun be over the n***er house, and be asking n***er like, damn, what's we counting money, n***er, these the money counters." MOORE responded, "Right." RICKS continued, "So like he, n***er like, so scared he ain't going, he ain't going nowhere. You know what I'm saying?" MOORE agreed, "Right." RICKS concluded, "So, so you know what I'm saying everything they do (conducting drug trafficking business) they still doing it there! Now he ain't leaving." MOORE asked, "Where?" RICKS replied, "Same spot (the same place where RICKS robbed him before)!" MOORE then asked, "So what's up with it?" RICKS replied, "Man, you already know! What time you coming down?" MOORE replied, "S**t, s**t, what's up?" RICKS answered, "Man, come down so I can tell you what's up. How long? I'm on 118th. How long 'till you come down?" MOORE answered, "S**t, I can come now for real." RICKS said, "Alright, come on, hurry up." MOORE responded, "Alright, here I come."

259. On or about April 26, 2013, at approximately 6:30 p.m., BRANDY M. BATES called KEITH RICKS on the telephone. At the time of the call, RICKS was in Atlanta, Georgia, and BATES was in Cleveland, Ohio. During the call, BATES said, "Hey, listen man. I wish you would have came up here with me, man." RICKS said, "Why?" BATES answered, "'Cause, man, I f**kin' got

my hand on what (heroin) the f**k you be f**kin' with, man."

RICKS said, "Swear?" BATES said, "Like my people told me like he couldn't, 'cause I told my people like I needed ten rags, he like s**t, I ain't got ten rags, but I got this (heroin). You know what I'm saying?" RICKS said, "Yeah." BATES said, "Yeah, he sayin' you dump this, you know what I'm sayin', you can have that s**t (heroin)." RICKS said, "Damn, I mean, what you mean, you need me to come up there?" BATES then explained that RICKS did not need to come to Cleveland but that she would be meeting with the heroin supplier the next day at 7:30 p.m.

260. On or about April 26, 2013, at approximately 10:16 p.m., MAURICE GOLSTON called KEITH RICKS on the telephone. At the time of the call, RICKS was in Atlanta, Georgia. During the call, RICKS told GOLSTON, "Okay, okay. I'll see you, I'll see you real, real soon, and you gone love me (because RICKS will have heroin to sell)." GOLSTON said, "Alright, bet." RICKS said, "Alright."

261. On or about April 27, 2013, at approximately 11:19 p.m., BRANDY M. BATES called KEITH RICKS on the telephone. During the call, BATES said, "That's why and then, look, that's what I was saying about these mother-f**kers up here. I went and hollered at like three people. All of them like, damn B, you never say you know you good for it. I give you the bread

(money), but you gonna have to give me a few days right. Which I ain't tripping like, alright, I ain't tripping that of course, like, but the mother-f**kers who I been talking to I know got that s**t. You know what I'm saying? So, it's like them mother-f**kers like, 'you know what I'm saying, B?' I'm like, 'cause I really can do s**t with the—you know me. You—what I talked to you about. We can really go do that s**t (heroin), but I'm like, 'I'm not f**king with nobody up here.' Like, 'If I come up here and tell y'all I got this move, this opportunity, that y'all mother-f**kers, it's, it's f**king rocket science man. You can't do nothing but win, you know. What I'm saying, and you can win over everybody and be the only mother-f**ker with this plug (source of heroin).' S**t, I'm a have it. I'm like, man, if I gotta go out there, if it just be me and you, if I gotta go out there, man, I'm not f**king with nobody in Cleveland. And if I am 'bout to pay six racks (a quantity of money)." RICKS responded, "Man, listen, we talking too much on the phone." BATES said, "Oh, yeah."

262. On or about May 3, 2013, at approximately 10:21 a.m., KEITH RICKS called BRANDY M. BATES on the telephone. During the call, BATES told RICKS, "Yeah, I'm done (out of heroin)." RICKS said, "For real?" BATES said, "I mean, yeah, we really can be. I mean, I, yeah, 'bout to drop a couple dollars off. We can be

done right now." RICKS replied, "Alright, um, you can get, you can get what's (heroin) here, then." BATES said, "Alright." RICKS agreed, "Alright."

263. On or about May 4, 2013, at approximately 8:07 a.m., ROBERT BELK sent KEITH RICKS a text message that said, "What up I'm tryin to get my feet wet (obtain heroin)."

264. On or about May 4, 2013, at approximately 3:16 p.m., KEITH RICKS called JAMEZ JAMEL WEBB II on the telephone. During the call, RICKS said, "What up Mez (WEBB)? Where you at, man?" WEBB said, "I'm on the west. Where you at?" RICKS said, "N***a, what the f**k you doing on the f**king west man?" WEBB said, "Looking at something real quick." RICKS said, "Man, I got something (heroin) come through. Where you at. I need you all man." WEBB said, "Aw, shh, I'm about to come over there." RICKS said, "Come on."

265. On or about May 5, 2103, at approximately 9:27 p.m., ROBERT BELK called KEITH RICKS on the telephone. During the call, BELK told RICKS, "Man, that s**t (heroin) ain't nothing. Man, you can get this s**t back." RICKS said, "Man, where the f**k you at? Come to my mother house." BELK said, "Alright, here I come."

266. On or about May 5, 2013, at approximately 11:44 p.m., ROBERT BELK called KEITH RICKS on the telephone. During the

call, BELK told RICKS, "Hey, man, make sure, make sure you're good tomorrow, (have heroin) man. I got a couple of moves (heroin sales) for you." RICKS said, "Alright, what time?" BELK said, "Nothing. I'm talking about couple plays, (heroin sales) though. Like nice plays." RICKS said, "Alright. I'll be up in the morning." BELK said, "Alright."

267. On or about May 6, 2013, at approximately 11:53 a.m., ROBERT BELK called KEITH RICKS on the telephone. During the call, BELK told RICKS, "What up, dog? 'Bout to say, s**t, I just got up. I got seven (a quantity of money) for you right now if you want it." RICKS said, "Just come through." BELK said, "Alright."

268. On or about May 6, 2013, at approximately 6:14 p.m., KEITH RICKS called DAMMARKRO SHERRON NOLAN, SR., to warn him that L.D., aka "Head," a person known to the Grand Jury but not charged herein, had been arrested for drug trafficking. RICKS asked, "You ain't mess with (deal with) no hundred five n***as (drug traffickers from East 105th Street, Cleveland, Ohio), did you?" NOLAN said, "Huh?" RICKS said, "You never mess with no hundred five n***as, did you?" NOLAN said, "Uh-uh, why?" RICKS said, "Nah, nah, nah, one of those n***as got knocked (arrested) and he ain't tell nobody. My n***a about to send my n***a the paperwork. He just go knocked on the 27th (April 27, 2013).

The n***a name, uh, when y'all went to All Star weekend he was down there with you all." NOLAN said, "Which one was it?" RICKS said, "His name 'Head.'" NOLAN said, "Head, Head." RICKS said, "He be with that n***a Tez and them." NOLAN said, "What he look like?" RICKS said, "He bald head. I think he got a Bentley too. I think he just got a Bentley or something. But he got a red Escalade. But he ain't tell nobody he got knocked (arrested) though. My n***a, the n***a about to send him the paperwork. N***a got knocked with a brick (kilogram) of heroin, a brick (kilogram) of coke, two-hundred and fifty thousand in cash (\$250,000.00) and a .40 cal (firearm) on the 27th of April."

269. On May 6, 2013, at approximately 6:26 p.m., KEITH RICKS called MACEO MOORE on the telephone. RICKS explained to MOORE that someone was bringing him the "paperwork" related to the recent arrest of "Head" from East 105th Street. RICKS explained, "Man, that n***a got caught with a brick (kilogram) of heroin, a brick of cocaine, and \$260,000, and a pistol." MOORE responded, "For real?" RICKS stated, "Hell yeah, and he ain't told nobody out here." MOORE assured RICKS that he was aware of "Head's" arrest, adding, "He got hit on the freeway." RICKS asked, "So, what happened though?" MOORE told RICKS "Call

me, call me. I'm gonna talk to you when I see you." They then agreed to meet.

270. On or about May 7, 2013, at approximately 4:12 p.m., TERRANCE FLETCHER possessed \$4,011 in cash, scales, and marijuana in a vehicle and was arrested in Cleveland, Ohio.

271. On or about May 7, 2013, at approximately 6:46 p.m., KEITH RICKS called H.H., a person known to the Grand Jury but not charged herein. During the call, H.H. asked RICKS, "...What they take Black T (TERRANCE FLETCHER) to jail for?" RICKS responded, "Uh, I think they, um, found some, um, residue or some s**t." H.H. said, "Them thirsty ass police?" RICKS responded, "Yep."

272. On or about May 8, 2013, SHAUN D. WILLIAMS sold approximately 1.47 grams of heroin and 1.53 grams of cocaine to a confidential informant in Cleveland, Ohio.

273. On or about May 9, 2013, R.B., a person known to the Grand Jury but not charged herein, called KEITH RICKS on the telephone. During the call, R.B. explained to RICKS that the F.B.I. had a warrant for R.B.'s arrest. R.B. claimed not to know why, "I wasn't f**king with nobody, man. I been dead broke, man. I wasn't playin' (trafficking in drugs)." So this, you know, this probably some old s**t, "Cuz," from Cali (California). Probably. Or it might be even Weezy (BRANDY M.

BATES), man. I don't know, man. I don't know. I ain't even tripping man." RICKS said, "Man, for real?" Later in the call, RICKS and R.B. speculated on who might have cooperated with the F.B.I. RICKS asked, "Damn man, what the f**k? So you say you think it's Weezy (BRANDY M. BATES) or your cousin from Cali?" R.B. said, "I think it's "Cuz" from Cali, you know I ain't even gonna put Weezy (BRANDY M. BATES) in there. I think it's "Cuz" from Cali." RICKS said, "For real?" R.B. said, "Straight up like that." RICKS said, "Y'all was f**king around (dealing in drugs with each other)?" R.B. said, "Huh?" RICKS said, "I mean, I thought you all weren't even ..." R.B. said, "You know that n***a been in the fed's joint (federal prison). But you know, remember, remember when he f**ked me up and he, he f**ked up, got my money f**ked up and Black T (TERRANCE FLETCHER) money all f**ked up?" RICKS said, "Yeah." R.B. said, "They thought I had booked (robbed) Black T (TERRANCE FLETCHER), man. He probably would talk. He probably was settin' me up then. Ain't no telling."

274. On or about May 12, 2013, at approximately 6:26 p.m., KEITH RICKS called DAMMARKRO SHERRON NOLAN, SR., on the telephone. During the call, NOLAN told RICKS he would soon be flying to Atlanta, Georgia. RICKS said, "This week. Oh, okay, what, um, will that still be a go with your peoples (heroin

suppliers) down there?" NOLAN said, "Yes, sir. 'Cause I'm gonna do it myself down there (buy the heroin myself)." RICKS said, "Huh?" NOLAN repeated, "I'm gonna do it myself down there." RICKS said, "Okay, bet. I'm gonna grab some paper (money) and know what I'm saying, and I'm gonna bring it down there." NOLAN said, "Okay. Hey, man, uh, s**t, man, man, make something happen for us, man. I'm, you know, I'm trying to lead you in the direction. You know?" Later in the call, NOLAN said, "I need you to come through for us one time, baby." NOLAN and RICKS agreed to meet soon. RICKS explained, "Alright, alright, I'm waiting on BRANDY (BATES) to come pick me up. Then we'll meet up."

275. On or about May 13, 2013, at approximately 1:30 p.m., ROBERT BELK sent KEITH RICKS a text message about paying RICKS money BELK owed in which BELK complained about the pace of drug deals, that said, "It was slow is f**k yesterday I got u." The next day, May 14, 2013, at approximately 3:14 a.m., RICKS sent BELK a text message complaining that the money that BELK had paid RICKS, believed to be \$1,000, was short. The text message said, "She said its 985 (\$985)." BELK responded by sending a text message to RICKS at 3:35 a.m. that said, "I miss counted then I be ready in min."

276. On or about May 16, 2013, at approximately 11:29 p.m., KEITH RICKS called MARCUS BLUE on the telephone. During the call, RICKS and BLUE discussed R.B., who had recently turned himself in to face federal drug charges. RICKS speculated that the arrest showed R.B. had been lying to him and others he owed money to about not having any money because the charges showed R.B. had still been trafficking in drugs. RICKS said, "I was with Mace (MACEO MOORE) and s**t. And he, he (R.B.) was scared that um, like man, he was like, man, Mace (MACEO MOORE) ain't going to tell Black T (TERRANCE FLETCHER), 'cause I think he, Mace (MACEO MOORE), uh, Fatboy (R.B.) owe Black T (TERRANCE FLETCHER) like seven bands (\$7,000)." BLUE responded, "He (R.B.) is, he definitely in some fed hole, that was Monday. So he ain't downtown. They probable moved somewhere else now." RICKS said, "Swear. Damn. Fatman, Fatboy (R.B.), that's my dude." BLUE said, "Yeah, that's crazy." RICKS said, "Yeah, Fatboy (R.B.) my dude, though."

277. On or about May 17, 2013, the residence of DAMMARKRO SHERRON NOLAN, SR., was burglarized in Painesville, Ohio. Among the items reported stolen was a "Britling" (sic.) watch valued at \$5,900.

278. On or about May 17, 2013, at approximately 9:07 p.m., KEITH RICKS sent a text message to MACEO MOORE about a photo

that RICKS had seen posted on the internet, which read, "Yo that ain't ole boy (DAMMARKRO SHERRON NOLAN, SR., 's) b/watch... He asked about 1 like that....Take that pic down if so."

279. On or about May 18, 2013, at approximately 9:31 a.m., KEITH RICKS called MACEO MOORE on the telephone. During the call, RICKS asked MOORE, "Hey, why did you have me on that picture, man (the picture of the watch posted on the internet referred to in overt act 278)?" MOORE replied, "Which one?" RICKS said, "The jewelry man!" RICKS then asked, "Hey, man, let me ask you a question, man." MOORE said, "What?" RICKS responded, "Man, that ain't that dude's (DAMMARKRO SHERRON NOLAN, SR., 's) watch, is it?" MOORE replied, "No, no. Why do you say that?" RICKS replied, "'Cause, you were asking about a Brighton watch. I'm like, man. See if you can find somebody, you told somebody, heard somebody, get a Brighton watch. I'm like, man, I don't- I'm just, man, like s**t, I don't know, like man, listen, y'all ain't, you gotta go, you gotta go to the jewelry stores, know what I'm sayin', cause n***as probably, like someone in that bitch, can't n***as ain't even gonna have a Brighton watch."

280. On or about May 18, 2013, at approximately 1:00 p.m., BRANDY M. BATES called KEITH RICKS on the telephone. During the call, RICKS and BATES discussed DAMMARKRO SHERRON NOLAN, SR.,

whose home had been burglarized the previous day (overt act 277). RICKS said, "Man, this n***er (NOLAN) dumb as f**k, man." BATES said, "Who?" RICKS said, "That n***er (NOLAN) keep on getting hit, man." BATES said, "He got hit again?" RICKS said, "Man, listen dude, listen dude, he about to meet me, man. Man." BATES said, "Man, where y'all at?" RICKS said, "Man, he need to go get a job." BATES said, "No, he just needs to give it to us, man. He just need to everyday, listen, 'cause every day when he come in the house he need just, need to just make a deposit over to us, man." RICKS said, "How the f**k, man? Who the f**k? In a six month period, man, you get hit four or five times." BATES said, "Man." RICKS said, "I'll call you as soon as that n***er meet up with me, man." BATES said, "Okay, did you call your people yet?" RICKS said, "I'm with one of them now." In the background, an unidentified male said to BATES, "Man, it just weighs, it says 27." BATES responded, "That's right." After saying "alright" to RICKS, BATES then told the unidentified male, "They all 28 a bag (28 grams, or one ounce, of heroin per bag)."

281. On or about May 18, 2013, at approximately 1:12 p.m., DAMMARKRO SHERRON NOLAN, SR., arrived and met with KEITH RICKS outside RICKS' residence on East 118th Street in Cleveland,

Ohio. At approximately, 1:29 p.m., BRANDY M. BATES arrived and joined RICKS and NOLAN outside RICKS' residence.

282. On or about May 18, 2013, at approximately 1:46 p.m., KEITH RICKS called GREGORY HAMILTON on the telephone. RICKS told HAMILTON, "Pull on 118th at my grandma's house real quick." HAMILTON responded, "Ok." At approximately, 1:52 p.m., HAMILTON arrived on East 118th Street outside RICKS' house. RICKS obtained a quantity of heroin from DAMMARKRO SHERRON NOLAN, SR.,'s vehicle, and then entered HAMILTON's vehicle to provide him with the heroin. At approximately 1:56 p.m., RICKS exited HAMILTON's vehicle and HAMILTON left.

283. On or about May 18, 2013, at approximately 1:52 p.m., KEITH RICKS called an unidentified person on the telephone. While making the call, RICKS said to an unidentified person in the background, "White boys they want some heroin to try out? I was right here. His house is right here. This house is right here." RICKS said to the caller, "Hey come through, I got to show you something (heroin)."

284. On or about May 18, 2013, at approximately 2:02 p.m., BRANDY M. BATES entered DAMMARKRO SHERRON NOLAN, SR.,'s vehicle outside KEITH RICKS' residence on East 118th Street and obtained a quantity of heroin from NOLAN.

285. On or about May 18, 2013, at approximately 2:49 p.m., KEITH RICKS called LEAMON SHEPHARD on the telephone. During the call, RICKS asked, "Where you at, Juice?" SHEPHARD replied, "Who dis?" RICKS said, "This your n***er." SHEPHARD said, "Oh, I'm in the hood." RICKS said, "Come, come on a hundred and eighteenth (East 118th Street, Cleveland, Ohio)." SHEPHARD said, "Here I come right now." Over the rest of the afternoon, RICKS called several other associates, telling them to come see him right away.

286. On or about May 18, 2013, at approximately 10:39 p.m., ROBERT BELK called KEITH RICKS on the telephone. During the call, RICKS told BELK, "I'm waiting on her (BRANDY M. BATES) to meet the ol' boy (heroin supplier)." BELK said, "Alright, you think it's going to be tonight, though?" RICKS said, "Yeah, she (BATES) just left me. She (BATES) 'bout to meet him (heroin supplier), so she gonna call me as soon as she meet up with him." BELK said, "Alright."

287. On or about May 19, 2013, at approximately 12:43 p.m., after MACEO MOORE sent a text message to KEITH RICKS, which said, "Call me," RICKS called MOORE on the telephone. During that conversation, RICKS told MOORE, "Man, I was, I kept calling you n***a. I, I still got that (heroin) put to the side n***a."

RICKS emphasized, "I still gonna have your s**t (heroin) put to the side, n***a." MOORE replied, "Aight."

288. On or about May 20, 2013, at approximately 8:21 p.m., DAMMARKRO SHERRON NOLAN, SR., called KEITH RICKS on the telephone to discuss the robbery of another drug dealer's stash house. During the call, NOLAN told RICKS, "The new spot (heroin stash house) is on 70th." RICKS said, "I'm about to, um, I'm about to call you as soon as I leave here." NOLAN said, "Alright."

289. On or about May 20, 2013, at approximately 10:16 p.m., KEITH RICKS called DAMMARKRO SHERRON NOLAN, SR., on the telephone again to discuss the potential robbery target. NOLAN answered the call by saying, "I'm gonna call you right back. I'm in the trap (heroin stash house)." RICKS said, "Alright." Approximately four minutes later, at 10:20 p.m., NOLAN sent RICKS a text message which said, "76 st clair im at a old school it's the new trap (heroin stash house)." Approximately one minute later, at 10:21 p.m., RICKS replied by text message, "K." NOLAN then responded back by text message at 10:22 p.m., "Its (the heroin) here." RICKS then responded back at 10:23 p.m., "I'm go meet u when u leave there." Nolan replied back by text message almost immediately, "K".

290. On or about May 20, 2013, at approximately 11:52 p.m., KEITH RICKS called DAMMARKRO SHERRON NOLAN, SR., on the telephone to discuss the drug dealer RICKS and NOLAN were planning to rob. During the call, RICKS said, "Yeah, I think they (the robbery target) left." NOLAN said, "Wow, that's crazy. Alright." RICKS said, "Alright, um, s**t, whenever you get a chance now, s**t, we on it though. Whenever you get a chance though, we need to link up, alright." NOLAN said, "Yep."

291. On or about May 20, 2013, SHAUN D. WILLIAMS sold approximately 1.27 grams of cocaine to a confidential informant in Cleveland, Ohio.

292. On or about May 22, 2013, SHAUN D. WILLIAMS obtained heroin from GREGORY T. SAVAGE, SR. after SAVAGE met with EDWARD F. NIX. WILLIAMS then sold approximately 2.47 grams of heroin to a confidential informant in Cleveland, Ohio.

293. On or about May 22, 2013, SHAUN D. WILLIAMS sold approximately .84 grams of cocaine to a confidential informant in Cleveland, Ohio.

294. On or about May 22, 2013, at approximately 10:39 a.m., DAMMARKRO SHERRON NOLAN, SR., called KEITH RICKS on the telephone. During the call, NOLAN said, "Uh, Whip (the heroin dealer NOLAN and RICKS were planning to rob) just called me and told him to call him, ASAP." RICKS replied, "Who, Whip?" NOLAN

said, "Yeah." RICKS said, "Alright, what's up?" NOLAN said, "I don't know. I was just checkin' to make sure everything was alright." RICKS said, "Oh yeah, everything, yeah, yeah." NOLAN said, "Oh, okay, okay, okay, so, yeah, I just callin' to see what he want then. That why I want to call you first." RICKS replied, "Okay, okay, see what's up then. I'm, I'm, I'm gonna be at the gym. Stop through after you finished."

295. On or about May 24, 2013, at approximately 2:17 p.m., KEITH RICKS sent BRANDY M. BATES a text message that said, "I'm waitin on all my ppl 2 come thur wit this paper (money)."

296. On or about May 24, 2013, BRANDY M. BATES and LACHELLE T. HALL traveled from Cleveland, Ohio, to the Atlanta, Georgia area for the purpose of obtaining heroin.

297. On or about May 24, 2013, at approximately 7:01 p.m., BRANDY M. BATES called KEITH RICKS on the telephone. During the call, BATES told RICKS, "I don't like this s**t (heroin) man." RICKS said, "What?" BATES said, "I lightweight want to tell him to give me my money back." RICKS laughed, and BATES said, "I'm like, man, I want some. They don't understand, like, I don't want, this is the same s**t, this keep on being the same s**t, they keep saying it's something different, but it's not, it's the same s**t." RICKS said, "Damn." BATES said, "My people already got that s**t, you know what I'm sayin'? I'm not about

to keep takin' them that s**t." RICKS responded, "Man, it's on, it's on, what you wanna do? I'm proba-, I'm behind you." BATES said, "I might, I gotta play right here real fast. I might just get our money back. I gonna make like a, you know, couple dollars."

298. On or about May 25, 2013, BRANDY M. BATES and LACHELLE T. HALL traveled from the Atlanta, Georgia area to Ohio with approximately 1.3 pounds of marijuana and an unknown quantity of heroin. During the trip, BATES and HALL were stopped by the Ohio State Highway Patrol. BATES' vehicle was searched. The marijuana was located and seized, but the heroin was not found. BATES was arrested and HALL was released with BATES' vehicle to continue the trip to Cleveland, Ohio.

299. On or about May 25, 2013, at approximately 12:08 p.m., LACHELLE T. HALL called KEITH RICKS on the telephone. During the call, HALL said, "Baby, it's all bad." RICKS said, "What happened?" HALL said, "We got pulled over! They searched the s**t out of the vehicle. BRANDY (BATES) is in jail." RICKS said, "Swear?" HALL said, "Yes." RICKS asked again, "Swear?" HALL said, "They took all. I'm driving. I have to come back to Cleveland and prolly pick up people. BRANDY (BATES) is going to be in Medina County Jail. They saying like they charging her with possession of marijuana. Um, the police officer that

talked to me, he really was like, you know, it's like it's, it's really not a big deal, like it's really, it wasn't that much (marijuana) so, it's gonna be a felony five. It's just possession of marijuana and that's it. But the other one is trying to scare the s**t out of BRANDY (BATES) and all that other s**t, but that's not the same man who I talked to." At approximately 12:50 p.m., LACHELLE T. HALL arrived at KEITH RICKS' residence on East 118th Street in Cleveland, Ohio, in BRANDY M. BATES' vehicle.

300. On or about May 25, 2013, at approximately 1:52 p.m., LACHELLE T. HALL called KEITH RICKS on the telephone. During the call, HALL told RICKS, "Hey, they kept asking her about her car, like, you had to see them, they was so, like, 'Oh my gosh, do you know who did this to her car? She sure got enemies.'" RICKS responded, "Man, what? They don't even know (about the heroin), huh?"

301. On or about May 25, 2013, at approximately 3:59 p.m., LACHELLE T. HALL called KEITH RICKS on the telephone. During the call, HALL and RICKS discussed BRANDY M. BATES' arrest again. During the conversation, HALL told RICKS, "Right, that's what I keep saying, that s**t ain't, possession of marijuana ain't s**t compared to the s**t (heroin) she could have been charged with."

302. On or about May 26, 2013, at approximately 10:26 p.m., KEITH RICKS called LACHELLE T. HALL on the telephone. During the call, RICKS and HALL again discussed BRANDY M. BATES' arrest the day before. RICKS said, "Know what I'm saying, man. 'Cause she could get charged for, she could get charged for everything she tried (heroin trafficking). The trap (hidden compartment in a vehicle used to transport drugs or money) came through." HALL replied, "Whoo-wee. Oh, wow." RICKS said, "Yeah."

303. On or about May 28, 2013, at approximately 3:17 p.m., KEITH RICKS called DAMMARKRO SHERRON NOLAN, SR., on the telephone. At the time of the call, NOLAN was in Atlanta, Georgia, and RICKS was in Cleveland, Ohio. During the call, NOLAN said, "Damn, so what you gonna stay up there (in Cleveland) until, man, I told ya, oh man." RICKS said, "Na, na, na, na, na, hell no. I'm a try to be there Thursday. S**t, f**k that." NOLAN replied, "Man, I need you here before Thursday because I put, ah. I ordered a pizza (kilogram of heroin). And you know I can't eat all the pizza (sell the entire kilogram of heroin) by myself." RICKS replied, "Okay, okay, okay, okay, okay, um. Alright. Alright, bet. I'm going to call you back in two minutes." NOLAN said, "Alright."

304. On or about May 28, 2013, GREGORY T. SAVAGE, SR. sold 15.23 grams of cocaine base (crack) and then agreed to sell heroin to a confidential informant.

305. In or about the end of May 2013, MACEO MOORE and J.J., a person known to the Grand Jury but not charged herein, burglarized a stash house of a rival drug trafficker in Cleveland, Ohio, and stole approximately 200 grams of heroin, approximately 600 grams of cocaine, and a firearm.

306. On or about May 29, 2013, ROLANDO J. REED agreed to sell approximately nine grams of heroin to a confidential informant in Cleveland, Ohio.

307. On or about May 29, 2013, MACEO MOORE, JAMEZ JAMEL WEBB II, and ROLANDO J. REED distributed approximately 5.93 grams of heroin to a confidential informant in Cleveland, Ohio.

308. On or about May 30, 2013, at approximately 2:21 p.m., GREGORY HAMILTON called KEITH RICKS on the telephone. During the call, RICKS said, "Alright, listen. I be comin' get two, two (a quantity of heroin) from you, n***a." HAMILTON said, "That's what I'm talkin' about." RICKS said, "Alright, here I come."

309. On or about May 31, 2013, at approximately 4:44 p.m., TERRANCE FLETCHER called MACEO MOORE on the telephone. During the call, FLETCHER told MOORE, "I'm 'bout to come that way."

MOORE said, "You 'bout to come this way? Out here?" FLETCHER said, "Yeah. What you was gonna, you 'bout to leave?" MOORE said, "No. I can wait up here." FLETCHER said, "Alright. I'm up at, uh, come to the Shell right quick." MOORE said, "How long?" FLETCHER said, "Like five minutes." FLETCHER said, "Alright."

310. On or about June 3, 2013, at approximately 12:45 p.m., a confidential informant attempted to contact JAMEZ JAMEL WEBB II on the telephone to arrange the purchase of heroin. WEBB did not answer but then called the confidential informant back a few minutes later. During the conversation, the confidential informant told WEBB, "I ran out of that (heroin), man. I need some, I need to re-up." WEBB said, "What was you talkin' about?" The confidential informant said, "Like fourteen (14 grams of heroin). I made a little something off of it. Can you make it a little better though (higher quality heroin)?" WEBB replied, "Yeah, um, you say, that's how much you want? Fourteen (14 grams of heroin)?" The confidential informant replied, "Yeah, fourteen (14 grams of heroin), I've got fourteen hundred (\$1,400)."

311. On or about June 3, 2013, at approximately 12:48 p.m., JAMEZ JAMEL WEBB II called MACEO MOORE on the telephone. During the call, WEBB said, "You remember the one play (heroin

transaction) from the other day?" MOORE replied, "Yeah". WEBB said, "He just called back," MOORE replied, "For real?" WEBB continued, "Yeah, but he got four hundred (\$400) more." MOORE replied, "Alright, I'm about to call you right back." Within seconds of the conclusion of that call, and for the next several minutes, MOORE attempted to call J.J., a person known to the Grand Jury but not charged herein. At approximately 12:53 p.m., MOORE called WEBB back. WEBB asked MOORE, "Is it over (is the heroin gone)?" MOORE replied, "No, it ain't, but my people (J.J.) didn't answer the phone. I'm trying to, um, give them a call right quick. I'ma call you right as soon ..." WEBB answered "Alright." At approximately 12:58 p.m., MOORE talked to J.J. on the telephone. During the call, MOORE said, "S**t, I need to holla at you (see you), it ain't over, is it (is the heroin gone)?" J.J. said, "Um, no, not really." J.J. asked MOORE where he was, and MOORE replied, "Yeah, I'm on 85th, but um, somebody just called me . . . remember when I kept coming back and forth (to obtain heroin)." MOORE asked again, "That's over (is the heroin gone)?" J.J. said, "It's a little, about, a hundred and five, on the fifth (five grams of heroin for \$105 per gram)." At approximately 1:02 p.m., MOORE called WEBB back. WEBB asked, "It's over with?" MOORE replied, "No, uh . . . only got five (grams of heroin)." WEBB said, "F**k, damn, it's

somewhere close where I can go get it?" MOORE said, "Um, no. How soon he (the confidential informant) gonna be down there?" WEBB responded, "S**t, he right here. I'm about to just take this s**t, man (rob the confidential informant)." MOORE advised, "You might need 'em the next time (as a future heroin customer)." WEBB responded, "Yeah, but s**t, I ain't got nobody who's got nothing (enough heroin) right now." MOORE asked, "You said he's right there?" WEBB replied, "Yeah," MOORE said, "Ah, well, s**t then. Be careful." WEBB responded, "Ok."

312. On or about June 4, 2013, at approximately 11:43 a.m., MAURICE GOLSTON called MACEO MOORE on the telephone. During the call, GOLSTON complained to MOORE that they no longer had a "spot" to use for drug trafficking. GOLSTON complained, "But these n***as don't even respect having a spot like, y'all n***as stupid." MOORE advised, "You have to get another one somewhere." GOLSTON said, "Huh?" MOORE said, "You have to get another one." GOLSTON responded, "How the f**k that's going to happen? N***as ain't trying to put no money, n***as ain't trying to do s**t, man. These n***as don't want to hustle (earn a steady living by selling drugs). These n***as trying to live lick to lick (drug deal to drug deal)."

313. On or about June 4, 2013, at approximately 2:46 p.m., MACEO MOORE had a conversation with J.J., a person known to the

Grand Jury but not charged herein, on the telephone about a robbery they were planning. During the conversation, J.J. told MOORE, "We missed it this morning, dog." MOORE replied, "For real?" J.J. said, "Yeah." MOORE said, "You ain't know, huh?" J.J. said, "Man, we ... it was right there ... the plan (to commit a robbery) I was talking 'bout." MOORE said, "Yeah." J.J. said, "All that s**t came together. Could have popped it off. Me and you. We just had to be together." Later in the conversation, J.J. told MOORE, "We need that damn, umm, that one thing we was talking 'bout." MOORE said, "Oh yeah. I'm gonna look into it. See if they got some." J.J. said, "And those straps." MOORE replied, "Umm, hmm." J.J. said, "The twist ties." MOORE said, "Yeah, oh, that's what I thought you was talking 'bout. What else you talking 'bout?" J.J. said, "Need the twist ties (zip ties for restraining someone) and the um, the other thing." MOORE said, "What's the other thing?" J.J. said, "With the button on it (stun gun)." MOORE answered, "Oh, yeah, yeah. Ok, yeah, ok. Alright, let me check into it then." J.J. said, "Yeah, do that. Do that." MOORE said, "Alright." J.J. said, "'Cause the thing I was telling you about should be in today, too. So, we should be able to get live for this weekend." MOORE said, "Alright then."

314. On or about June 5, 2013, at approximately 7:23 p.m., MACEO MOORE and J.J., a person known to the Grand Jury but not charged herein, spoke on the telephone. During the call, J.J. said to MOORE, "I ain't doing s**t. I was just checking on you to see if you found those things (zip ties and stun gun)?" MOORE said, "You coming this way?" J.J. said, "I wasn't." MOORE said, "I'm a get 'em though, don't worry about it." J.J. said, "We probably need 'em this weekend." MOORE said, "Ok, I got you. I'm a get 'em." J.J. said, "Alright."

315. On or about June 5, 2013, a confidential informant contacted DIONTE THOMPSON by telephone and made arrangements to purchase an "eightball" of heroin, or 3.5 grams in Cleveland, Ohio.

316. On or about June 5, 2013, while the confidential informant and an undercover officer were meeting with THOMPSON to discuss the pending purchase of heroin, MAURICE GOLSTON approached and talked to the confidential informant and undercover officer. During the conversation, GOLSTON requested, "Turn me on to some of those people (heroin customers), I'm trying to get my phone back jumping (with heroin sales)."

317. On or about June 5, 2013, DIONTE THOMPSON sold approximately 3.06 grams of heroin to an undercover officer in Cleveland, Ohio.

318. On or about June 6, 2013, an undercover officer contacted DIONTE THOMPSON on the telephone to discuss purchasing heroin from THOMPSON. During the call, the undercover officer asked, "Well s**t, look, what's, um, what's the ticket (price) on like fourteen (14 grams of heroin), one four?" THOMPSON replied, "On, um, fourteen?" The undercover officer said, "Yeah." THOMPSON asked, "What you wanted, how I told you at the car right there?" The undercover officer said, "I'm asking for that, yeah." THOMPSON said, "Uh, s**t, let me, I'm gonna have to call you right back." The undercover officer said, "Alright, hit me back." Later, THOMPSON called the undercover officer back on the telephone. During this call, the undercover officer asked, "Yeah, what's happening?" THOMPSON replied, "Yeah, yeah, uh, sixteen (\$1,600 for 14 grams of heroin)." The undercover officer said, "Sixteen?" THOMPSON replied, "Yeah."

319. On or about June 6, 2013, J.J., a person known to the Grand Jury but not charged herein, possessed rubber gloves, ski masks, and binoculars that were intended for use in a robbery of a drug trafficker to be committed by MACEO MOORE and J.J.

320. On or about June 6, 2013, ROBERT BELK agreed to sell approximately 12 grams of heroin to a confidential informant.

321. On or about June 6, 2013, ROLANDO J. REED agreed to sell approximately seven grams of heroin to a confidential informant.

322. On or about June 19, 2013, MACEO MOORE possessed approximately 5 grams of heroin, digital scales with cocaine residue, and approximately \$9,550 in cash at his residence in Euclid, Ohio.

323. On or about June 19, 2013, KEITH RICKS and DIONTE THOMPSON jointly possessed digital scales with cocaine and heroin residue and plastic baggies with heroin residence at their residence in Cleveland, Ohio.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

The Grand Jury further charges:

On or about May 6, 2011, in the Northern District of Ohio, Eastern Division, FREDERICK L. DARLING, aka "Freddy Fox," knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, did conduct or attempt to conduct a financial transaction affecting interstate and foreign commerce which in fact involved the proceeds of specified unlawful activity, to wit: distribution of

a controlled substance in violation of Title 21, United States Code, Section 841(a)(1), by withdrawing \$20,944.50 from Charter One Bank Account 452019-***-* that was used to purchase cashier's check #53055***** for the purchase of real property, to wit: 1523 E 55th Street, Cleveland, OH (Permanent Parcel No: 104-14-018), and knowing that the financial transaction was designed in whole or in part to conceal the true ownership of the proceeds of the specified unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT 3

The Grand Jury further charges:

On or about September 22, 2011, in the Northern District of Ohio, Eastern Division, EUGENE MILLER, aka "Joker," BRENDA H. NORMAN, and LEAMON SHEPHARD, aka "Juice," did knowingly and intentionally distribute approximately 27.64 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 4

The Grand Jury further charges:

On or about November 14, 2011, in the Northern District of Ohio, Eastern Division, FREDERICK L. DARLING, aka "Freddy Fox," EUGENE MILLER, aka "Joker," and BRENDA H. NORMAN, did knowingly and intentionally distribute approximately 27.84 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 5

The Grand Jury further charges:

On or about November 21, 2011, in the Northern District of Ohio, Eastern Division, EUGENE MILLER, aka "Joker," did knowingly and intentionally distribute approximately 25.84 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 6

The Grand Jury further charges:

On or about January 12, 2012, in the Northern District of Ohio, Eastern Division, DAVID E. MCCALL, JR. did knowingly and

intentionally distribute .4 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 7

The Grand Jury further charges:

On or about June 4, 2012, in the Northern District of Ohio, Eastern Division, EUGENE MILLER, aka "Joker," did knowingly and intentionally distribute approximately 27.44 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 8

The Grand Jury further charges:

On or about June 15, 2012, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL, did knowingly and intentionally possess with the intent to distribute 170.5 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 9

The Grand Jury further charges:

On or about June 15, 2012, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL, having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, that is, Trafficking in Drugs, in Case Number CR-07-491381-A, in the Cuyahoga County Common Pleas Court, on or about July 17, 2007; Trafficking in Drugs with a Firearm Specification, in Case Number CR-08-519316-A, in the Cuyahoga County Common Pleas Court, on or about June 19, 2009; and Weapons Under Disability, in Case Number CR-09-524368-A in the Cuyahoga County Common Pleas Court, on or about August 13, 2009, did knowingly possess in and affecting interstate and foreign commerce a firearm, to wit: a Beretta 9mm semi-automatic handgun, serial number PZ24341.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 10

The Grand Jury further charges:

On or about August 13, 2012, in the Northern District of Ohio, Eastern Division, FREDERICK L. DARLING, aka "Freddy Fox," and EUGENE MILLER, aka "Joker," did knowingly and intentionally

distribute approximately 53.47 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 11

The Grand Jury further charges:

On or about August 15, 2012, in the Northern District of Ohio, Eastern Division, FREDERICK L. DARLING, aka "Freddy Fox," and EUGENE MILLER, aka "Joker," did knowingly and intentionally distribute approximately 54.76 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 12

The Grand Jury further charges:

On or about August 28, 2012, in the Northern District of Ohio, Eastern Division, EUGENE MILLER, "aka Joker," and ERIAN J. HARWELL did knowingly and intentionally distribute approximately 28.19 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in

violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 13

The Grand Jury further charges:

From on or about August 2012, to on or about December 31, 2012, in the Northern District of Ohio, Eastern Division, LEAMON EDDIE, aka "Budda," did manage and control any place, permanently or temporarily, as an owner, lessee, occupant, mortgagagee and agent, namely the premises of Red Line Towing, at 12416 Euclid Avenue, Cleveland, Ohio, and did knowingly and intentionally rent, lease, profit from and otherwise make available for use, with or without compensation, the premises of Red Line Towing, at 12416 Euclid Avenue, Cleveland, Ohio, for the purpose of unlawfully manufacturing, storing, distributing and using a controlled substance, namely heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 14

The Grand Jury further charges:

On or about September 11, 2012, in the Northern District of Ohio, Eastern Division, EUGENE MILLER, aka "Joker," did knowingly and intentionally distribute approximately 27.37 grams

of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 15

The Grand Jury further charges:

On or about September 13, 2012, in the Northern District of Ohio, Eastern Division, EUGENE MILLER, aka "Joker," did knowingly and intentionally distribute approximately 27.98 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 16

The Grand Jury further charges:

On or about September 21, 2012, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL did knowingly and intentionally distribute approximately .7 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 17

The Grand Jury further charges:

On or about September 26, 2012, in the Northern District of Ohio, Eastern Division, EUGENE MILLER, aka "Joker," and LEAMON SHEPHARD, aka "Juice," did knowingly and intentionally distribute approximately 27.26 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 18

The Grand Jury further charges:

On or about October 5, 2012, in the Northern District of Ohio, Eastern Division, KEVIN M. SCOTT, aka "Drew," did knowingly and intentionally distribute approximately .2 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 19

The Grand Jury further charges:

On or about October 5, 2012, in the Northern District of Ohio, Eastern Division, LUTHER B. JOHNSON did knowingly and

intentionally distribute approximately .2 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 20

The Grand Jury further charges:

On or about October 8, 2012, in the Northern District of Ohio, Eastern Division, THOMAS C. MCCULLY, aka "Cully," did knowingly and intentionally distribute approximately .1 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 21

The Grand Jury further charges:

On or about October 10, 2012, in the Northern District of Ohio, Eastern Division, STEVENSON BLACK, aka "Black," did knowingly and intentionally distribute approximately .24 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 22

The Grand Jury further charges:

On or about October 10, 2012, in the Northern District of Ohio, Eastern Division, LUTHER B. JOHNSON did knowingly and intentionally distribute approximately .1 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C)

COUNT 23

The Grand Jury further charges:

On or about October 11, 2012, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL did knowingly and intentionally distribute approximately .6 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 24

The Grand Jury further charges:

On or about October 17, 2012, in the Northern District of Ohio, Eastern Division, LUTHER B. JOHNSON did knowingly and intentionally distribute approximately .4 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I

controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 25

The Grand Jury further charges:

On or about October 17, 2012, in the Northern District of Ohio, Eastern Division, STEVENSON BLACK, aka "Black," did knowingly and intentionally distribute approximately .4 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 26

The Grand Jury further charges:

On or about October 22, 2012, in the Northern District of Ohio, Eastern Division, THOMAS C. MCCULLY, aka "Cully," did knowingly and intentionally distribute approximately 1.1 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 27

The Grand Jury further charges:

On or about October 25, 2012, in the Northern District of Ohio, Eastern Division, EUGENE MILLER, aka "Joker," and ERIAN J. HARWELL did knowingly and intentionally distribute approximately 27.4 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 28

The Grand Jury further charges:

On or about October 25, 2012, in the Northern District of Ohio, Eastern Division, DOUGLAS T. JOHNSON did knowingly and intentionally distribute approximately .9 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 29

The Grand Jury further charges:

On or about October 31, 2012, in the Northern District of Ohio, Eastern Division, THOMAS C. MCCULLY, aka "Cully," did

knowingly and intentionally distribute approximately 1.97 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 30

The Grand Jury further charges:

On or about November 7, 2012, in the Northern District of Ohio, Eastern Division, DOUGLAS T. JOHNSON did knowingly and intentionally distribute approximately .44 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 31

The Grand Jury further charges:

On or about November 13, 2012, in the Northern District of Ohio, Eastern Division, DOUGLAS T. JOHNSON did knowingly and intentionally distribute approximately 1.92 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 32

The Grand Jury further charges:

On or about November 15, 2012, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL did knowingly and intentionally distribute approximately .8 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 33

The Grand Jury further charges:

On or about November 19, 2012, in the Northern District of Ohio, Eastern Division, JAMAL H. WILLIAMS did knowingly and intentionally distribute approximately 4.85 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 34

The Grand Jury further charges:

On or about November 20, 2012, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL did knowingly and intentionally distribute approximately 3.4 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I

controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 35

The Grand Jury further charges:

On or about November 21, 2012, in the Northern District of Ohio, Eastern Division, KEVIN M. SCOTT, aka "Drew," did knowingly and intentionally distribute approximately .2 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 36

The Grand Jury further charges:

On or about November 23, 2012, in the Northern District of Ohio, Eastern Division, STEVENSON BLACK, aka "Black," did knowingly and intentionally distribute approximately 1.06 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 37

The Grand Jury further charges:

On or about November 23, 2012, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL, did knowingly and

intentionally distribute approximately 4.7 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 38

The Grand Jury further charges:

On or about November 26, 2012, in the Northern District of Ohio, Eastern Division, LEAMON SHEPHARD, aka "Juice," COREY D. ETHERIDGE, and EUGENE MILLER, aka "Joker," did knowingly and intentionally distribute approximately 26.78 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 39

The Grand Jury further charges:

On or about November 27, 2012, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL, did knowingly and intentionally distribute approximately 6.97 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 40

The Grand Jury further charges:

On or about December 3, 2012, in the Northern District of Ohio, Eastern Division, THOMAS C. MCCULLY, aka "Cully," did knowingly and intentionally distribute approximately 2.02 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 41

The Grand Jury further charges:

On or about December 4, 2012, in the Northern District of Ohio, Eastern Division, JAMAL H. WILLIAMS did knowingly and intentionally distribute approximately 3.19 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 42

The Grand Jury further charges:

On or about December 5, 2012, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL did knowingly and intentionally distribute approximately 10.2 grams of a mixture or substance containing a detectable amount of heroin, a

Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 43

The Grand Jury further charges:

On or about December 11, 2012, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL did knowingly and intentionally distribute approximately 10.6 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 44

The Grand Jury further charges:

On or about December 11, 2012, in the Northern District of Ohio, Eastern Division, KENNETH E. HARRIS, did knowingly and intentionally possess with intent to distribute 3.22 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 45

The Grand Jury further charges:

On or about December 18, 2012, in the Northern District of Ohio, Eastern Division, FREDERICK L. DARLING, aka "Freddy Fox,"

did knowingly and intentionally distribute approximately 2.97 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 46

The Grand Jury further charges:

On or about December 19, 2012, in the Northern District of Ohio, Eastern Division, JAMAL H. WILLIAMS did knowingly and intentionally distribute approximately 2.98 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 47

The Grand Jury further charges:

On or about December 20, 2012, in the Northern District of Ohio, Eastern Division, KENNETH E. HARRIS, did knowingly and intentionally distribute approximately 3.43 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 48

The Grand Jury further charges:

On or about December 26, 2012, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL did knowingly and intentionally distribute approximately 27.8 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 49

The Grand Jury further charges:

On or about January 3, 2013, in the Northern District of Ohio, Eastern Division, THOMAS C. MCCULLY, aka "Cully," did knowingly and intentionally distribute approximately 2.05 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 50

The Grand Jury further charges:

On or about January 3, 2013, in the Northern District of Ohio, Eastern Division, DANA M. ERVIN did knowingly and intentionally possess with the intent to distribute approximately 8 grams of a mixture or substance containing a

detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 51

The Grand Jury further charges:

On or about January 3, 2013, in the Northern District of Ohio, Eastern Division, DANA M. ERVIN did knowingly and intentionally possess with the intent to distribute approximately 17 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 52

The Grand Jury further charges:

On or about January 3, 2013, in the Northern District of Ohio, Eastern Division, DANA M. ERVIN, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, that is, Sexual Battery and Unlawful Sexual Conduct with a Minor, in Case Number CR-03-441939-ZA, in the Cuyahoga County Common Pleas Court, on or about May 11, 2004, did knowingly possess in and affecting interstate and foreign commerce a firearm, to wit: a Smith & Wesson, .38 caliber

revolver, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 53

The Grand Jury further charges:

On or about January 4, 2013, in the Northern District of Ohio, Eastern Division, DANA M. ERVIN did knowingly and intentionally possess with the intent to distribute approximately 23 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 54

The Grand Jury further charges:

On or about January 4, 2013, in the Northern District of Ohio, Eastern Division, DANA M. ERVIN did knowingly and intentionally possess with the intent to distribute approximately 78 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 55

The Grand Jury further charges:

On or about January 4, 2013, in the Northern District of Ohio, Eastern Division, DANA M. ERVIN, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, that is, Sexual Battery and Unlawful Sexual Conduct with a Minor, in Case Number CR-03-441939-ZA, in the Cuyahoga County Common Pleas Court, on or about May 11, 2004, did knowingly possess in and affecting interstate and foreign commerce firearms, to wit: a Cobra, Model CA-380, .380 caliber semi-automatic pistol, serial number CP013923, and a Taurus, .38 caliber, revolver, serial number YJ339960, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 56

The Grand Jury further charges:

On or about January 7, 2013, in the Northern District of Ohio, Eastern Division, FREDERICK L. DARLING, aka "Freddy Fox," did knowingly and intentionally distribute approximately 5.33 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 57

The Grand Jury further charges:

On or about January 15, 2013, in the Northern District of Ohio, Eastern Division, KEVIN M. SCOTT, aka "Drew," did knowingly and intentionally distribute approximately .4 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 58

The Grand Jury further charges:

On or about January 18, 2013, in the Northern District of Ohio, Eastern Division, JAMAL H. WILLIAMS and ANDREW E. LOVING did knowingly and intentionally distribute approximately 4.29 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 59

The Grand Jury further charges:

On or about January 22, 2013, in the Northern District of Ohio, Eastern Division, JAMAL H. WILLIAMS and ANDREW E. LOVING did knowingly and intentionally distribute approximately 4.72

grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 60

The Grand Jury further charges:

On or about January 28, 2013, in the Northern District of Ohio, Eastern Division, TERRANCE FLETCHER, aka "Black T," did knowingly and intentionally distribute approximately 3.5 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 61

The Grand Jury further charges:

On or about January 29, 2013, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL did knowingly and intentionally distribute approximately 28.1 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 62

The Grand Jury further charges:

On or about January 31, 2013, in the Northern District of Ohio, Eastern Division, TERRANCE FLETCHER, aka "Black T," did knowingly and intentionally distribute approximately 5.61 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 63

The Grand Jury further charges:

From on or about February 2013, to on or about April 30, 2013, in the Northern District of Ohio, Eastern Division, LEAMON EDDIE, aka "Budda," did manage and control any place, permanently or temporarily, as an owner, lessee, occupant, mortgagee and agent, namely the premises at 19099 Lakeshore Boulevard, Euclid, Ohio, and did knowingly and intentionally rent, lease, profit from and otherwise make available for use, with or without compensation, the premises at 19099 Lakeshore Boulevard, Euclid, Ohio, for the purpose of unlawfully manufacturing, storing, distributing and using a controlled substance, namely heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 856(a)(2).

COUNT 64

The Grand Jury further charges:

On or about February 6, 2013, in the Northern District of Ohio, Eastern Division, TERRANCE FLETCHER, aka "Black T," did knowingly and intentionally distribute approximately 10.23 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 65

The Grand Jury further charges:

On or about February 6, 2013, in the Northern District of Ohio, Eastern Division, DAVID D. HARSLEY, did knowingly and intentionally possess with the intent to distribute approximately 47.43 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 66

The Grand Jury further charges:

On or about February 11, 2013, in the Northern District of Ohio, Eastern Division, EDWARD F. NIX did knowingly and intentionally distribute approximately 6.93 grams of a mixture

or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 67

The Grand Jury further charges:

On or about February 12, 2013, in the Northern District of Ohio, Eastern Division, PIERRE A. CAMPBELL did knowingly and intentionally distribute approximately 26.9 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 68

The Grand Jury further charges:

On or about February 13, 2013, in the Northern District of Ohio, Eastern Division, EDWARD F. NIX did knowingly and intentionally distribute approximately 10.30 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 69

The Grand Jury further charges:

On or about February 20, 2013, in the Northern District of Ohio, Eastern Division, EDWARD F. NIX did knowingly and intentionally distribute approximately 24.76 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 70

The Grand Jury further charges:

On or about February 22, 2013, in the Northern District of Ohio, Eastern Division, LEAMON SHEPHARD, aka "Juice," and MAURICE GOLSTON, aka "Reese," did knowingly and intentionally distribute approximately 7.88 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 71

The Grand Jury further charges:

On or about March 7, 2013, in the Northern District of Ohio, Eastern Division, LAMAR L. MIDDLETON, having been

previously convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: Trafficking in Drugs with a firearm specification, on or about June 18, 2008, case number CR-07-503192-A, in the Cuyahoga County Court of Common Pleas and Trafficking in Drugs, on or about May 8, 2012, case number CR-12-560468-A; did knowingly possess in and affecting interstate and foreign commerce two firearms, to wit: a Smith & Wesson model SW9VE handgun bearing serial number DSL3949 and a Smith & Wesson handgun bearing serial number DTL4843, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 72

The Grand Jury further charges:

On or about March 7, 2013, in the Northern District of Ohio, Eastern Division, LAMAR L. MIDDLETON did knowingly and intentionally possess with the intent to distribute approximately 9.3 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 73

The Grand Jury further charges:

On or about March 7, 2013, in the Northern District of Ohio, Eastern Division, LAMAR L. MIDDLETON did knowingly and

intentionally distribute approximately 2.3 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 74

The Grand Jury further charges:

On or about May 6, 2013, in the Northern District of Ohio, Eastern Division, MAURICE GOLSTON, aka "Reese," did knowingly and intentionally distribute approximately 2.67 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 75

The Grand Jury further charges:

On or about May 8, 2013, in the Northern District of Ohio, Eastern Division, SHAUN D. WILLIAMS did knowingly and intentionally distribute approximately 1.47 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 76

The Grand Jury further charges:

On or about May 8, 2013, in the Northern District of Ohio, Eastern Division, SHAUN D. WILLIAMS did knowingly and intentionally distribute approximately 1.53 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 77

The Grand Jury further charges:

On or about May 20, 2013, in the Northern District of Ohio, Eastern Division, SHAUN D. WILLIAMS did knowingly and intentionally distribute approximately 1.27 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 78

The Grand Jury further charges:

On or about May 22, 2013, in the Northern District of Ohio, Eastern Division, SHAUN D. WILLIAMS and GREGORY T. SAVAGE, SR. did knowingly and intentionally distribute approximately 2.47

grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 79

The Grand Jury further charges:

On or about May 24, 2013, in the Northern District of Ohio, Eastern Division, and elsewhere, BRANDY M. BATES, aka "Weezy," and LACHELLE T. HALL did travel in interstate commerce from the State of Ohio to the State of Georgia, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit: a business enterprise involving the distribution of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and the said BRANDY M. BATES, aka "Weezy," and LACHELLE T. HALL, thereafter, did perform and attempt to perform acts to promote, manage, carry on, and facilitate the promotion, management, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT 80

The Grand Jury further charges:

On or about May 28, 2013, in the Northern District of Ohio, Eastern Division, GREGORY T. SAVAGE, SR. did knowingly and intentionally distribute approximately 15.23 grams of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 81

The Grand Jury further charges:

On or about May 29, 2013, in the Northern District of Ohio, Eastern Division, MACEO MOORE, aka "Chase," aka "Paper," JAMEZ JAMEL WEBB II, aka "Mez," and ROLANDO J. REED, aka "Chill," did knowingly and intentionally distribute approximately 5.93 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 82

The Grand Jury further charges:

On or about June 5, 2013, in the Northern District of Ohio, Eastern Division, DIONTE THOMPSON, aka "Dionte Ricks," aka "Pringles," did knowingly and intentionally distribute

approximately 3.06 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 83

The Grand Jury further charges:

On or about June 19, 2013, in the Northern District of Ohio, Eastern Division, MACEO MOORE, aka "Chase, aka "Paper," did knowingly and intentionally possess with intent to distribute approximately 5 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNTS 84-196

The Grand Jury further charges:

On or about the dates listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants listed below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Section 846:

Count	Defendants	Date	Time
84	VERNON O. NORMAN	September 14, 2011	2:24 p.m.
85	VERNON O. NORMAN	September 14, 2011	3:38 p.m.
86	EUGENE MILLER, aka "Joker" LUTHER B. JOHNSON	August 8, 2012	12:41 p.m.
87	LUTHER B. JOHNSON EUGENE MILLER, aka "Joker"	August 11, 2012	12:22 p.m.
88	EUGENE MILLER, aka "Joker" FREDERICK L. DARLING, aka "Freddy Fox"	August 13, 2012	12:43 p.m.
89	EUGENE MILLER, aka "Joker" FREDERICK L. DARLING, aka "Freddy Fox"	August 15, 2012	9:44 a.m.
90	BRENDA H. NORMAN THOMAS C. MCCULLY, aka "Cully"	August 15, 2012	1:27 p.m.
91	EUGENE MILLER, aka "Joker" ERIAN J. HARWELL	August 17, 2012	3:14 p.m.
92	EUGENE MILLER, aka "Joker" ERIAN J. HARWELL	August 18, 2012	11:31 a.m.
93	EUGENE MILLER, aka "Joker" ERIAN J. HARWELL	August 20, 2012	11:25 a.m.
94	FREDERICK L. DARLING, aka "Freddy Fox"	August 27, 2012	12:59 p.m.
95	LUTHER B. JOHNSON EUGENE MILLER, aka "Joker"	August 28, 2012	5:12 p.m.
96	EUGENE MILLER aka "Joker" ANDREW E. LOVING	August 29, 2013	3:44 p.m.
97	EUGENE MILLER, aka "Joker" BRENDA H. NORMAN	August 30, 2012	11:57 a.m.

98	LEAMON SHEPHARD, aka "Juice" MARCUS BLUE, aka "Blue"	November 1, 2012	12:24 p.m.
99	LEAMON SHEPHARD, aka "Juice" MICHAEL JONES, aka "Monk"	November 1, 2012	6:52 p.m.
100	LEAMON SHEPHARD, aka "Juice" BENEDITTO A. BELFIORE, aka "Ditto"	November 3, 2012	5:30 p.m.
101	LEAMON SHEPHARD, aka "Juice" BENEDITTO A. BELFIORE, aka "Ditto"	November 5, 2012	5:21 p.m.
102	LEAMON SHEPHARD, aka "Juice" BENEDITTO A. BELFIORE, aka "Ditto"	November 6, 2012	3:05 p.m.
103	LEAMON SHEPHARD, aka "Juice" JACOB O. DERRICKSON	November 9, 2012	1:53 p.m.
104	LEAMON SHEPHARD, aka "Juice" JACOB O. DERRICKSON	November 9, 2012	2:32 p.m.
105	LEAMON SHEPHARD, aka "Juice" JACOB O. DERRICKSON	November 16, 2012	3:35 p.m.
106	STEVENSON BLACK, aka "Black"	November 21, 2012	2:29 p.m.
107	LEAMON SHEPHARD, aka "Juice" MICHAEL JONES, aka "Monk"	December 7, 2012	11:50 a.m.
108	LEAMON SHEPHARD, aka "Juice" MICHAEL JONES, aka "Monk"	December 14, 2012	3:14 p.m.
109	FREDERICK FERRELL, aka "Little Fred" THOMAS C. MCCULLY, aka "Cully"	December 28, 2012	7:37 p.m.

110	THOMAS C. MCCULLY, aka "Cully" MICHAEL BUCHANAN, aka "Israel"	December 29, 2012	8:40 p.m.
111	THOMAS C. MCCULLY, aka "Cully" FREDERICK L. DARLING, aka "Freddy Fox"	December 30, 2012	5:40 p.m.
112	THOMAS C. MCCULLY, aka "Cully" MICHAEL BUCHANAN, aka "Israel"	December 31, 2012	1:25 p.m.
113	THOMAS C. MCCULLY, aka "Cully" FREDERICK FERRELL, aka "Little Fred"	January 5, 2013	4:53 p.m.
114	FREDERICK FERRELL, aka "Little Fred" THOMAS C. MCCULLY, aka "Cully"	January 8, 2013	9:12 p.m.
115	KEVIN M. SCOTT, aka "Drew"	January 15, 2013	1:33 p.m.
116	THOMAS C. MCCULLY, aka "Cully" MICHAEL BUCHANAN, aka "Israel"	January 21, 2013	9:35 p.m.
117	PIERRE A. CAMPBELL DAVID E. MCCALL, JR.	January 29, 2013	1:44 p.m.
118	VINCENT MORGAN PIERRE A. CAMPBELL	January 29, 2013	2:43 p.m.
119	VINCENT MORGAN PIERRE A. CAMPBELL	January 29, 2013	6:12 p.m.
120	VINCENT MORGAN PIERRE A. CAMPBELL	January 29, 2013	7:17 p.m.
121	ANTWONE NOWDEN PIERRE A. CAMPBELL	January 31, 2013	10:11 a.m.
122	DAVID E. MCCALL, JR. PIERRE A. CAMPBELL	January 31, 2013	8:31 p.m.
123	GREGORY HAMILTON, aka "Duke" PIERRE A. CAMPBELL	February 1, 2013	10:17 a.m.
124	DAVID D. HARSLEY PIERRE A. CAMPBELL	February 1, 2013	3:18 p.m.

125	ANTWONE NOWDEN PIERRE A. CAMPBELL	February 1, 2013	6:45 p.m.
126	ANTWONE NOWDEN PIERRE A. CAMPBELL	February 2, 2013	10:14 a.m.
127	DAVID D. HARSLEY PIERRE A. CAMPBELL	February 2, 2013	10:47 a.m.
128	DAVID D. HARSLEY PIERRE A. CAMPBELL	February 2, 2013	4:08 p.m.
129	GREGORY HAMILTON, aka "Duke" PIERRE A. CAMPBELL	February 3, 2013	6:21 a.m.
130	LEAMON SHEPHARD, aka "Juice" DOMINIQUE E. IVORY	February 4, 2013	5:29 p.m.
131	LEAMON SHEPHARD, aka "Juice" MARCUS BLUE, aka "Blue"	February 4, 2013	6:18 p.m.
132	LEAMON SHEPHARD, aka "Juice" DOMINIQUE A. BLAIR	February 5, 2013	6:10 p.m.
133	LEAMON SHEPHARD, aka "Juice" DOMINIQUE A. BLAIR	February 5, 2013	8:28 p.m.
134	LEAMON SHEPHARD, aka "Juice" DOMINIQUE A. BLAIR	February 7, 2013	1:47 p.m.
135	LEAMON SHEPHARD, aka "Juice" ANTWON EVANS, aka "Twon"	February 8, 2013	8:20 p.m.
136	ERIC C. POWELL PIERRE A. CAMPBELL	February 10, 2013	5:23 p.m.
137	ERIC C. POWELL PIERRE A. CAMPBELL	February 14, 2013	4:06 p.m.
138	LEAMON SHEPHARD, aka "Juice" ROBERT L. FOWLKES, JR.	February 17, 2013	5:34 p.m.
139	LEAMON SHEPHARD, aka "Juice" ANTWON EVANS, aka "Twon"	February 18, 2013	11:37 a.m.

140	LEAMON SHEPHARD, aka "Juice" ANTWON EVANS, aka "Twon"	February 18, 2013	10:26 p.m.
141	ERIC C. POWELL PIERRE A. CAMPBELL	February 20, 2013	2:16 p.m.
142	LEAMON SHEPHARD, aka "Juice" MAURICE GOLSTON, aka "Reese"	February 21, 2013	11:53 a.m.
143	LEAMON SHEPHARD aka "Juice" DEVONTA P. MAXWELL	February 21, 2013	2:23 p.m.
144	LEAMON SHEPHARD aka "Juice" DEVONTA P. MAXWELL	February 21, 2013	3:15 p.m.
145	LEAMON SHEPHARD, aka "Juice" MAURICE GOLSTON, aka "Reese"	February 22, 2013	4:11 p.m.
146	CARLTON A. HIGDON PIERRE A. CAMPBELL	February 27, 2013	12:44 p.m.
147	SANDRA L. MILLER RAYMUNDO D. WREN	February 27, 2013	1:08 p.m.
148	CARLTON A. HIGDON PIERRE A. CAMPBELL	February 28, 2013	1:57 p.m.
149	IVAN PERCY RAYMUNDO D. WREN	February 28, 2013	5:04 p.m.
150	PIERRE A. CAMPBELL CARLTON A. HIGDON	March 1, 2013	9:34 a.m.
151	IVAN PERCY RAYMUNDO D. WREN	March 1, 2013	11:10 a.m.
152	GREGORY HAMILTON PIERRE A. CAMPBELL	March 1, 2013	5:09 p.m.
153	PIERRE A. CAMPBELL LAMAR L. MIDDLETON	March 3, 2013	1:11 p.m.
154	RYLAND L. HARRIS, JR. LATRICE N. BLEVINS	March 4, 2013	12:27 p.m.
155	LEAMON SHEPHARD, aka "Juice" MARCUS BLUE, aka "Blue"	March 4, 2013	3:06 p.m.

156	LEAMON SHEPHARD, aka "Juice" MARCUS BLUE aka "Blue"	March 4, 2013	3:22 p.m.
157	RYLAND L. HARRIS, JR. aka "Slim" PIERRE A. CAMPBELL	March 4, 2013	4:50 p.m.
158	PIERRE A. CAMPBELL LAMAR L. MIDDLETON	March 5, 2013	11:29 p.m.
159	LEAMON SHEPHARD, aka "Juice" DOMINIQUE E. IVORY	March 5, 2013	2:41 p.m.
160	PIERRE A. CAMPBELL LAMAR L. MIDDLETON	March 6, 2013	11:53 a.m.
161	LEAMON SHEPHARD, aka "Juice" JERMAINE D. GRAYSON	March 7, 2013	11:06 a.m.
162	LEAMON SHEPHARD, aka "Juice" JERMAINE D. GRAYSON	March 7, 2013	12:47 p.m.
163	RYLAND L. HARRIS, JR. aka "Slim" PIERRE A. CAMPBELL	March 7, 2013	12:47 p.m.
164	IVAN PERCY LATRICE N. BLEVINS	March 7, 2013	12:50 p.m.
165	SANDRA L. MILLER LATRICE N. BLEVINS	March 9, 2013	1:08 p.m.
166	PIERRE A. CAMPBELL ANTWONE NOWDEN	March 10, 2013	5:28 p.m.
167	PIERRE A. CAMPBELL DARNELL ALEXANDER, JR.	March 14, 2013	6:41 p.m.
168	PIERRE A. CAMPBELL DARNELL ALEXANDER, JR.	March 14, 2013	7:28 p.m.
169	PIERRE A. CAMPBELL DARNELL ALEXANDER, JR.	March 15, 2013	9:39 a.m.
170	LEAMON SHEPHARD, aka "Juice" JERMAINE D. GRAYSON	March 17, 2013	6:56 p.m.
171	JOVAN FUSSELL PIERRE A. CAMPBELL	March 21, 2013	11:06 a.m.
172	PIERRE A. CAMPBELL JOVAN FUSSELL	March 21, 2013	5:40 p.m.
173	PIERRE A. CAMPBELL JOVAN FUSSELL	March 22, 2013	7:32 p.m.

174	LEAMON SHEPHARD, aka "Juice" MAURICE GOLSTON, aka "Reese"	March 26, 2013	1:40 p.m.
175	LEAMON SHEPHARD, aka "Juice" KEITH RICKS, aka "K-Mack"	March 27, 2013	11:56 a.m.
176	LEAMON SHEPHARD, aka "Juice" ROBERT L. FOWLKES, JR.	March 27, 2013	4:22 p.m.
177	KEITH RICKS, aka "K-Mack" MACEO MOORE, aka "Chase" aka "Paper"	April 17, 2013	11:02 a.m.
178	KEITH RICKS, aka "K-Mack" MARCUS BLUE, aka "Blue"	April 18, 2013	8:32 p.m.
179	KEITH RICKS, aka "K-Mack" BRANDY M. BATES, aka "Weezy"	April 26, 2013	6:30 a.m.
180	KEITH RICKS, aka "K-Mack" BRANDY M. BATES, aka "Weezy"	April 27, 2013	11:19 p.m.
181	KEITH RICKS, aka "K-Mack" BRANDY M. BATES, aka "Weezy"	May 3, 2013	10:21 a.m.
182	KEITH RICKS, aka "K-Mack" ROBERT BELK	May 5, 2013	11:44 p.m.
183	KEITH RICKS, aka "K-Mack" ROBERT BELK	May 6, 2013	11:53a.m.
184	KEITH RICKS, aka "K-Mack" DAMMARKRO SHERRON NOLAN, SR., aka "Money" aka "Marco"	May 12, 2013	6:26 p.m.

185	KEITH RICKS, aka "K-Mack" GREGORY HAMILTON, aka "Duke"	May 18, 2013	1:46 p.m.
186	KEITH RICKS, aka "K-Mack" ROBERT BELK	May 18, 2013	10:39 p.m.
187	KEITH RICKS, aka "K-Mack" DAMMARKRO SHERRON NOLAN, SR., aka "Money" aka "Marco"	May 20, 2013	8:21 p.m.
188	KEITH RICKS, aka "K-Mack" BRANDY M. BATES, aka "Weezy"	May 24, 2013	7:01 p.m.
189	KEITH RICKS, aka "K-Mack" LACHELLE T. HALL	May 25, 2013	12:08 p.m.
190	KEITH RICKS, aka "K-Mack" LACHELLE T. HALL	May 25, 2013	1:52 p.m.
191	KEITH RICKS, aka "K-Mack" LACHELLE T. HALL	May 26, 2013	10:26 p.m.
192	KEITH RICKS, aka "K-Mack" DAMMARKRO SHERRON NOLAN, SR., aka "Money" aka "Marco"	May 28, 2013	3:17 p.m.
193	KEITH RICKS, aka "K-Mack" GREGORY HAMILTON, aka "Duke"	May 30, 2013	2:21 p.m.
194	MACEO MOORE, aka "Chase," aka "Paper" JAMEZ JAMEL WEBB II, aka "Mez"	June 3, 2013	12:48 p.m.

195	MACEO MOORE, aka "Chase," aka "Paper" JAMEZ JAMEL WEBB II, aka "Mez"	June 3, 2013	12:53 p.m.
196	MACEO MOORE, aka "Chase," aka "Paper" JAMEZ JAMEL WEBB II, aka "Mez"	June 3, 2013	1:02 p.m.

All in violation of Title 21, United States Code, Section 843(b).

FORFEITURE

The Grand Jury further charges:

The allegations of Counts 1 through 196, inclusive are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853, 18 U.S.C. § 982, 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c). As a result of the foregoing offenses KEITH RICKS, aka "K-Mack," MACEO MOORE, aka "Chase," aka "Paper," MAURICE GOLSTON, aka "Reese," LEAMON SHEPHARD, aka "Juice," MARCUS BLUE, aka "Blue," DIONTE THOMPSON, aka "Dionte Ricks," aka "Pringles," CARL D. AKINS, DARNELL ALEXANDER, JR., BRANDY M. BATES, aka "Weezy," BENEDITTO A. BELFIORE, aka "Ditto," ROBERT BELK, STEVENSON BLACK, aka "Black," DOMINIQUE A. BLAIR, LATRICE N. BLEVINS, MICHAEL BUCHANAN, aka "Israel," PIERRE A. CAMPBELL, FREDERICK L. DARLING, aka "Freddy Fox," JACOB O. DERRICKSON,

DANA M. ERVIN, ANTWON EVANS, aka "Twon," FREDERICK FERRELL, aka "Little Fred," TERRANCE L. FLETCHER, aka "Black T," ROBERT L. FOWLKES, JR., JOVAN FUSSELL, JERMAINE D. GRAYSON, LACHELLE T. HALL, GREGORY HAMILTON, aka "Duke," KENNETH E. HARRIS, RYLAND L. HARRIS, JR., aka "Slim," DAVID D. HARSLEY, ERIAN J. HARWELL, CARLTON A. HIGDON, DOMINIQUE E. IVORY, DOUGLAS T. JOHNSON, LUTHER B. JOHNSON, MICHAEL L. JONES, aka "Monk," ANDREW E. LOVING, DEVONTA P. MAXWELL, DAVID E. MCCALL, JR., THOMAS C. MCCULLY, aka "Cully," LAMAR L. MIDDLETON, EUGENE MILLER, aka "Joker," SANDRA L. MILLER, VINCENT MORGAN, EDWARD F. NIX, DAMMARKRO SHERRON NOLAN, SR., aka "Money," aka "Marco," BRENDA H. NORMAN, VERNON O. NORMAN, ANTWONE NOWDEN, IVAN PERCY, ERIC C. POWELL, ROLANDO J. REED, aka "Chill," GREGORY T. SAVAGE, SR., KEVIN M. SCOTT, aka "Drew," JAMEZ JAMEL WEBB II, aka "Mez," JAMAL H. WILLIAMS, SHAUN D. WILLIAMS, and RAYMUNDO D. WREN, shall forfeit to the United States any and all property constituting or derived from any proceeds they obtained directly or indirectly as a result of the said violations; and, any and all of their property used or intended to be used in any manner or part to commit or to facilitate the commission of the said violations; and any property, real or personal, involved in such offense, or any property traceable to such property; and any and all property (including firearms and ammunition) involved in or

used in the commission of such violations; including, but not limited to, the following:

- a. Real property located at 1523 E 55th Street, Cleveland, Ohio (Permanent Parcel No: 104-14-018);
- b. Real Property located at 6309 Whittier Avenue, Cleveland, Ohio (Permanent Parcel No. 104-19-108);
- c. Real Property located at 7201 Linwood Avenue, Cleveland, Ohio 44103 (Permanent Parcel No. 106-10-124);
- d. 2007 Mercedes Benz, CLS550, VIN WDDDJ72X97A096027;
- e. \$9,550 in U.S. Currency; Beretta 9mm semi-automatic handgun, serial number PZ24341;
- f. Cobra, Model CA-380, .380 caliber semi-automatic pistol, serial number CP013923;
- g. Smith & Wesson, .38 caliber revolver, serial number obliterated.
- h. Smith & Wesson model SW9VE handgun, serial number DSL3949; and
- i. Smith & Wesson handgun, serial number DTL4843

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts pursuant to the E-Government Act of 2002.